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CLICK HERE FOR THE CEO'S REPORT DATED JUNE 24, 2013

CLICK HERE FOR COUNTY COUNSEL'S CORRESPONDENCE TO
THE SANITATION DISTRICTS DATED JULY 24, 2013

County of Los Angeles
CHIEF EXECUTIVE OFFICE
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
http://ceo.lacounty.gov

WILLIAM T FUJIOKA
Chief Executive Officer

June 24, 2013

To: Supervisor Mark Ridley-Thomas, Chairman
Supervisor Gloria Molina
Supervisor Zev Yaroslavsky
Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: William T Fujioka
Chief Executive Officer

SANTA CLARITA VALLEY SANITATION DISTRICT DRAFT CHLORIDE COMPLIANCE FACILITIES PLAN AND ENVIRONMENTAL IMPACT (ITEM NO. 77-C, AGENDA OF APRIL 30, 2013)

On April 30, 2013, the Board of Supervisors directed the Chief Executive Officer (CEO) to coordinate a review by the appropriate County departments of the Santa Clarita Valley Sanitation District's Draft Environmental Impact Report (DEIR) for the Chloride Compliance Facilities Plan to reduce chloride levels at the District's two wastewater treatment plants, including the submittal of comments on all areas of concern during the public review period. Also, the Board authorized County Counsel to retain outside counsel to review the DEIR and evaluate the document's legal adequacy, and report back on the County's options with respect to addressing the adequacy of the DEIR, including bringing a legal challenge to the project under the California Environmental Quality Act as appropriate.

On May 29, 2013, the CEO's status memo, (Attachment I), indicated that departmental comments would be analyzed and compiled into a final document and submitted to the Sanitation District by June 24, 2013. Subsequently, on June 19, 2013, the Sanitation District extended the comment period until July 24, 2013. County Counsel and the CEO have agreed that the County's transmittal to the Sanitation District will be prepared and submitted by County Counsel by the revised due date, taking into consideration all departmental comments provided to the CEO.

If you have any questions, please contact me, or your staff may contact Dorothea Park at (213) 974-4283, or via email at dpark@ceo.lacounty.gov.

WTF:RLR:DSP
BK:acn

Attachment (1)

c: Executive Office, Board of Supervisors
County Counsel
Beaches and Harbors
Fire
Parks and Recreation
Public Health
Public Library
Public Works
Regional Planning
Sheriff

County of Los Angeles
CHIEF EXECUTIVE OFFICE
Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
http://ceo.lacounty.gov

WILLIAM T FUJIOKA
Chief Executive Officer

May 29, 2013

To: Supervisor Mark Ridley-Thomas, Chairman
Supervisor Gloria Molina
Supervisor Zev Yaroslavsky
Supervisor Don Knabe
Supervisor Michael D. Antonovich

From: William T Fujioka
Chief Executive Officer

SANTA CLARITA VALLEY SANITATION DISTRICT DRAFT CHLORIDE COMPLIANCE FACILITIES PLAN AND ENVIRONMENTAL IMPACT REPORT (ITEM NO. 77-C, AGENDA OF APRIL 30, 2013)

On April 30, 2013, the Board of Supervisors directed the Chief Executive Officer to coordinate the review, by the appropriate County departments, of the Santa Clarita Valley Sanitation District's (Sanitation District) draft Environmental Impact Report (EIR) for the Chloride Compliance Facilities Plan, including the submittal of comments on all areas of concern during the public review period for the draft EIR, which closes on June 24, 2013.

As instructed, our Office is coordinating this review with County Counsel and the Departments of Beaches and Harbors, Fire, Parks and Recreation, Public Health, Public Library, Public Works, Regional Planning, and the Sheriff. Comments from the departments, which are due to this Office by May 31, 2013, will be analyzed and compiled into a final document and submitted to the Sanitation District on behalf of the County by the close of the draft EIR review period.

If you have any questions, please contact me, or your staff may contact Dorothea Park at (213) 974-4283, or via email at dpark@ceo.lacounty.gov.

WTF:RLR:DSP
BK:acn

c: Sheriff
Executive Office, Board of Supervisors
County Counsel
Fire Department
Parks and Recreation
Public Health
Public Library
Public Works
Regional Planning

COUNTY OF LOS ANGELES
OFFICE OF THE COUNTY COUNSEL
648 KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET
LOS ANGELES, CALIFORNIA 90012-2713

TELEPHONE
(213) 974-1923
FACSIMILE
(213) 687-7337
TDD
(213) 633-0901

JOHN F. KRATTLI
County Counsel

July 24, 2013

VIA EMAIL

Mary J. Jacobs, P.E.
Planning Section
Sanitation Districts of Los Angeles County
1955 Workman Mill Road
Whittier, California 90601
mjacobs@lacsd.org

Re: Comments on the Santa Clarita Valley Sanitation District Chloride Compliance Facilities Plan and Environmental Impact Report (Draft)

Dear Ms. Jacobs:

This letter and attached exhibits constitute the written comments of the County of Los Angeles ("County"), including departmental comments, on the Santa Clarita Valley Chloride Compliance Draft Facilities Plan ("FP") and Draft Environmental Impact Report ("DEIR") (collectively, the "FP/DEIR"), concerning projects to address brine disposal issues raised by the Upper Santa Clara River Chloride Total Maximum Daily Load ("Chloride TMDL").

The County understands that the Santa Clarita Valley Sanitation District ("SCVSD") must dispose of brine waste as part of its efforts to comply with the Chloride TMDL. The County has no objection to a waste disposal project that is both economical for SCVSD ratepayers and environmentally sensitive.

One of the three recommended alternative projects included in the FP/DEIR, however, raises serious concerns and is the primary focus of the County's comments. Alternative 3 proposes the routing of up to 90 heavy tanker trucks each day carrying brine waste nearly 40 miles from SCVSD facilities to City Terrace, a low-income neighborhood in East Los Angeles. Alternative 3 also includes a 'fail-safe option' of shipping brine waste to the County Sanitation Districts' Joint Water Pollution Control Plant ("JWPCP"). The FP/DEIR fails to

adequately assess the environmental impacts of this alternative, as will be discussed in these comments, although it reveals that City Terrace is the most significantly impacted neighborhood of any assessed by the FP/DEIR.

Alternative 3 raises environmental justice concerns as well. The County's comments address both those concerns and the FP/DEIR's failure to comply with the requirements of the California Environmental Quality Act ("CEQA").

Environmental Justice Concerns

The County submits that a project alternative that would subject the residents of the City Terrace neighborhood to multiple heavy tanker truck trips per hour and the construction of a truck unloading facility and a 1,500-foot long pipeline raises significant environmental justice concerns.

The California Attorney General has issued a White Paper regarding environmental justice issues for local and regional governments (Exhibit 1). In that White Paper, the Attorney General notes that "environmental justice" is defined in Gov't Code § 65040.12(e) as the "fair treatment of people of all races, cultures and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." In the opinion of the Attorney General, "[f]airness in this context means that the *benefits* of a healthy environment should be available to everyone, and the *burdens* of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects" (emphasis in original).

Alternative 3 raises just these environmental justice concerns. East Los Angeles (the area of unincorporated Los Angeles County which includes City Terrace) is 97.1% Hispanic, with a median household income of $37,271, compared to the County-wide median household income of $56,266. This places 25.3% of the population in this area below the poverty line, compared to a County-wide rate of 16.3%. The average household size is 4.09 persons, 37.2% more than the 2.98 person average household size in Los Angeles County. (*See* Exhibit 2, which consists of data from the U.S. Census Bureau.) None of these residents benefits from the Chloride TMDL project or the services of the SCVSD. Yet, of all the residents of Los Angeles County, those in City Terrace will be the most impacted by Alternative 3 due to the construction of a truck offloading facility, a 1,500-foot pipeline and the flow of up to 180 heavy tanker trucks through their neighborhood each day.

The adoption of Alternative 3 by the SCVSD would also raise the potential violation of Gov't Code § 11135(a). That statute provides, in relevant part:

> No person in the State of California shall, on the basis of race, national origin, ethnic group identification, religion, age, sex, sexual orientation, color, or disability, be unlawfully denied full and equal access to the benefits of, or be unlawfully subjected to discrimination under, any program or activity that is conducted, operated, or administered by the state or by any state agency, is funded directly by the state, or receives any financial assistance from the state . . . .

The Attorney General's White Paper notes that while this statute does not use the words "environmental justice,"

> in certain circumstances, it can require local agencies to undertake the same consideration of fairness in the distribution of environmental benefits and burdens discussed above. Where, for example, a general plan update is funded by or receives financial assistance from the state or a state agency, the local government should take special care to ensure that the plan's goals, objectives, policies, and implementation measures . . . do not result in the unmitigated concentration of polluting activities near communities that fall into the categories defined in Government Code section 11135.

White Paper at 1-2.

Section 11135(a) would apply to Alternative 3, both due to its discriminatory impacts on the City Terrace neighborhood and because SCVSD proposes to use low interest loans supplied by the Clean Water Act State Revolving Fund ("SRF") Project ("Based on current conditions, it is recommended that SRF loans be used to the maximum extent possible since bonds generally have higher interest rates than SRF loans." FP Section 7.6.2).[1] As such, the project would receive "financial assistance from the state," rendering it subject to Gov't Code § 11135.

[1] In its response to the Notice of Preparation, the State Water Resources Control Board indicates that the SCVSD is seeking SRF funding. *See* State Water Resources Control Board letter dated February 1, 2012, contained in Appendix 8-B of the FP/DEIR.

The SCVSD's selection of Alternative 3, which involves the long-distance trucking of brine waste into the City Terrace neighborhood (or any other alternative involving long-distance trucking of brine waste), would raise the discriminatory impacts noted by the Attorney General as Section 11135 violations. City Terrace is a community which is almost entirely Hispanic, with by far the largest number of residents of Mexican origin (see Exhibit 2). The industrial park where SCVSD proposes to locate the brine unloading facility is in the City Terrace neighborhood and is bounded on the west by Ramona Gardens, a City of Los Angeles low-income housing project. As discussed below in the analysis of cumulative impacts under CEQA, the industrial park is the site of at least two existing waste transfer facilities, which already bring numerous large trucks into the neighborhood. These facilities have requested modifications to their Conditional Use Permits ("CUPs") to allow additional truck traffic.

Even without accounting for these projects, the FP/DEIR shows that Alternative 3's air emissions impacts would be the greatest of any of the four final alternatives (except for the combination of Alternative 4 Phases I and II), with estimated greenhouse gases for construction and operation of 5,256 tons of CO_2 equivalents per year. The FP/DEIR also found that there would be a significant and unavoidable impact due to NOx emissions, which cannot be mitigated. Also, the noise caused by the round-trip passage of up to 180 heavy tanker trucks per day would exceed noise standards in the County's noise ordinance, and the truck traffic would further congest several of the neighborhood's already congested surface streets.

The choice of Alternative 3 thus would result in the "concentration of polluting activities" discussed by the Attorney General's White Paper, and would represent a violation of Gov't Code § 11135(a). If the SCVSD elects to proceed with Alternative 3 and obtains State Revolving Fund loans for its construction, the State Water Resources Control Board or the Los Angeles Regional Water Quality Control Board must investigate and potentially convene a hearing pursuant to Govt. Code § 11136 and take such other actions as required under state law to avert a violation of Gov't Code § 11135(a).

The Attorney General's White Paper also contains guidance on how agencies conducting a CEQA review must take into account environmental justice issues. These include consideration of the environmental setting of a project as well as its cumulative impacts; a project that causes particulate impacts might have little impact in an isolated area but "may be significant if the project will be located in the air shed of a community whose residents may be particularly sensitive to this type of pollution, or already are experiencing higher-than-average asthma rates." White Paper at 3. As noted below, the FP/DEIR did not

adequately assess such issues with respect to impacts on the City Terrace neighborhood. The White Paper also emphasized the importance of project alternatives and mitigation efforts under CEQA, including the selection of alternative project locations and the development of mitigation that involves the affected community, as required by *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 93.

The County's comments on environmental justice apply with equal force should the SCVSD choose Alternative 4, including the disposal of brine waste via trucking to the City Terrace neighborhood as part of Alternative 4 Phase II, as is set forth in FP Section 7.2.3.2.

While the FP/DEIR discussed other brine trucking destinations, the County submits that for both environmental and financial reasons, the SCVSD should not adopt any alternative that calls for long-distance trucking of brine waste.

Additionally and independent of CEQA, the selection of Alternative 3 as proposed in the FP/DEIR could raise public nuisance concerns due to the heavy truck traffic, with its associated noise, air pollution and traffic impacts.

The County's remaining comments focus on the inadequacies of the FP/DEIR under CEQA.

Comments Regarding Compliance of FP/DEIR with CEQA

A. Inadequacies of Notice of Preparation

The Notice of Preparation ("NOP") of an environmental impact report for the project, issued on January 6, 2012, described a chloride removal project consisting of treatment facilities and a "brine disposal system" through either deep well injection ("DWI") or construction of a pipeline to convey brine to an existing trunk sewer. The NOP did not include Alternative 3 or any other alternative that involved the trucking of brine waste, but merely stated that other feasible alternatives would be analyzed. Thus, the County, as a responsible agency, was not made aware of this alternative and had no reason or opportunity to provide comments for consideration of City Terrace impacts in the DEIR or to advise City Terrace neighborhood groups of any large scale trucking impacts.

The CEQA Guidelines require that, at a minimum, the NOP must include a description of the project and its location by street and address and cross-street or by attaching a specific map, as well as a discussion of the project's probable

environmental effects. 14 Cal. Code Reg. § 15082(a)(1). The purpose of this requirement is to provide responsible agencies, among others, "with sufficient information . . . to enable the responsible agencies to make a meaningful response." *Id.*

The NOP's description of project alternatives, however, omitted any mention of Alternative 3, its probable environmental impacts or any other alternative involving large-scale trucking of brine waste. The trucking of brine waste was a reasonably foreseeable alternative to the construction of a brine pipeline for the SCVSD and it should have been included in the NOP. However, without any mention whatsoever of using trucking to dispose of brine, there was no notice to the County (or the City Terrace neighborhood) of the massive impacts that would be created by Alternative 3. None of the comments submitted in response to the NOP (included in FP/DEIR Appendix 8-B) thus focused on potential impacts in City Terrace because the alternative discussed in the NOP was a pipeline which would have skirted the City Terrace neighborhood and involved only temporary construction impacts, not the long-term and significant impacts caused by a daily parade of heavy tanker trucks.

While three scoping meetings were held in the Santa Clarita area regarding the project during February 2012 (DEIR at 8-5, 8-6), no scoping or public meetings were held in City Terrace until after release of the DEIR, and then only at the request of County Supervisor Gloria Molina. Those meetings held in City Terrace elicited significant opposition to Alternative 3, as is discussed below. This opposition would have been revealed earlier had the NOP fulfilled its role as an informational document and potentially would have caused the SCVSD to omit Alternative 3 as infeasible.

B. Failure to Incorporate All Required Elements of DEIR

Pursuant to 14 Cal. Code Reg. § 15120(c), a DEIR is required to contain, among other elements, a project description (14 Cal. Code Reg. § 15124), a description of the environmental setting (*id.* at § 15125) and a consideration and discussion of alternatives to the proposed project (*id.* at § 15126.6). The DEIR does not meet these requirements. First, it does not contain a full project description. The description (though inadequate, as discussed below) is contained in FP Section 7. The environmental setting of the project is not in the DEIR, but is contained in FP Section 2. That section, too, is inadequate. The CEQA Guidelines require that an environmental impact report ("EIR") must "include a description of the physical environmental conditions in *the vicinity of the project* . . ." 14 Cal. Code Reg. § 15125(a) (emphasis supplied). Section 2 contains no description of the environmental conditions in the City Terrace neighborhood.

The alternatives discussion contained in FP Section 6 similarly does not describe a range of reasonable alternatives to the project, or to the location of the project, that would feasibly attain basic project objectives but avoid or substantially lessen any of the significant effects of the project. The alternatives discussion is instead a de minimis presentation of four alternatives that were themselves insufficiently evaluated in Section 6. The Final EIR must include a robust discussion of the project descriptions and a full consideration of alternatives, so that the adequacy of those elements can be judged under the statutory and regulatory requirements of CEQA.

C. Failure to Analyze Reasonable Alternatives to Selected Project Alternatives

CEQA requires that an EIR describe a reasonable range of alternatives to the project or to its location that could feasibly attain the project's objectives while reducing or avoiding its significant impacts. 14 Cal. Code Reg. § 15126.6(a). The discussion of alternatives "shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if those alternatives would impede to some degree the attainment of the project objectives, or would be more costly." 14 Cal. Code Reg. § 15126.6(b). The EIR must also contain "sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project." 14 Cal. Code Reg. § 15126.6(d).

The FP/DEIR, instead of presenting a single project with alternative implementation details, presents four separate projects with very different settings and environmental impacts. Alternative 1 proposes a pipeline for brine disposal, Alternative 2 proposes DWI technology, Alternative 3 requires trucking while Alternative 4 proposes a two-phase approach, with blending of waters with different chloride concentrations for downstream discharge as Phase I and (if required) a Phase II requiring further treatment and brine minimization steps with downstream discharge to the Santa Clara River via pipeline. The CEQA Guidelines require that the degree of specificity in an EIR "will correspond to the degree of specificity involved in the underlying activity which is described in the EIR." 14 Cal. Code Reg. § 15146. Due to their complexity, the four "alternatives" discussed in FP Section 6 required additional discussion of different compliance options. The discussion of alternatives is deficient under CEQA in several key respects.

1. Failure to Evaluate Site B for Location of Alternative 2's DWI Facility

In its discussion of Alternative 2 and the siting of the DWI project, only Site A (which is discussed in Section D below) is considered as the probable location for the DWI. FP Section 7.2.1. However, the analysis performed of potential locations for DWI sites (Appendix 6-C of the FP/DEIR) recommends that both Site A and Site B, an area located in a commercial/industrial area in the City of Santa Clarita, be evaluated for environmental impacts. ("Two top-ranked parcels were identified for Site A and another two for Site B. It is recommended that these parcels be presented to the EIR consultant and evaluated for environmental analysis." Appendix 6-C at 7.)

As discussed in Section E below, locating a DWI facility within Site A means the facility would be located in or adjacent to a designated Significant Ecological Area ("SEA") under the general plan applicable to the Santa Clarita Valley, as well as subject to additional restrictions on development within the SEA, including a possible Oak Tree Preserve.

FP Section 6 contains no evaluation of Site B and concludes that Site A should be the location of the DWI facility, even though Site B would be more compatible with the siting of the DWI facility, since it is located in a commercial/industrial area and would not involve any protected ecological areas. Additionally Site B would meet the other requirements for the siting of the DWI facility, according to the location analysis. Site B would thus avoid many of the adverse environmental impacts noted concerning the siting of the DWI facility at Site A.

The FP/DEIR provides no explanation for its failure to consider Site B as an alternate location for the DWI facility or to evaluate that alternate for its environmental impacts. Without giving any justification for failing to evaluate Site B as recommended in Appendix 6-C, Site B simply disappears from further discussions of Alternative 2. This failure violates CEQA.

2. Failure to Evaluate Alternate Treatment Option

FP Section 6 evaluates several different treatment methodologies to reduce the amount of brine waste that must be disposed of. Ultimately, Section 6 recommends the use of microfiltration and second pass reverse osmosis (MF/RO), which would reduce the daily brine waste flow to 500,000 gallons per day. There is, however, a further treatment option, evaporation, that would greatly reduce the

production of brine and could eliminate or significantly reduce the environmental impacts of brine disposal. FP at 6-54 to 6-55.

Section 6 considered, but rejected, the option of evaporation (combined with softening) as an alternative. CEQA requires that where an alternative may avoid significant environmental impacts, even if that alternative is more costly, it should be included. 14 Cal. Code Reg. § 15126.6(b).

D. Failure to Identify and Evaluate Significant Environmental Impacts

CEQA's core function is to "inform governmental decision makers and the public about the potential, significant environmental effects of proposed activities," to "identify ways that environmental damage can be avoided or significantly reduced," and to prevent "significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible." 14 CCR § 15002(a)(1-3).

To achieve these goals, the Legislature has declared that the purpose of the EIR is to "identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided." Pub. Res. Code § 21002.1(a).

The FP/DEIR fails to achieve these purposes with regard to Alternative 3 in several fundamental ways, as outlined below.

1. Failure to Adequately Describe Project

An accurate, finite project description "is indispensible to an informative, legally adequate EIR." *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192. As the authors of a leading CEQA treatise have written, "[w]ithout an accurate description on which to base the EIR's analysis, CEQA's objective of furthering public disclosure and informed environmental decision making would be stymied." S. Kostka & M. Zischke, *Practice Under the California Environmental Quality Act* (2d. ed.) at 12.2, page 577.

The FP/DEIR contains no adequate description of Alternative 3's truck unloading facility or the nature and routing of the pipeline linking the facility to the JWPCP sewer. Additionally, the description of the facility varies throughout the FP/DEIR.

First, the description of the truck unloading facility in FP Section 6.7.1 (a section which is cross-referenced throughout the FP/DEIR for the description of the unloading facility) is inadequate. Section 6.7.1 indicates that the unloading facility would require a two-acre property and consist of "four brine loading stations, paving and fencing." There is no discussion of what the "brine loading stations" would consist of: their height, any required lighting, pumps or other mechanical equipment, tanks or any structures. There is no description of truck staging areas or other adjunct facilities, though given the anticipated truck traffic of up to 9 trucks per hour, as well as the vagaries of traffic, it is foreseeable that there could be a need to stage trucks off-site so that they do not block the unloading facility. Consistent with the vagueness of the project's physical description, the FP/DEIR is not clear as to the operating hours of the truck unloading facility. Would the facility operate over a 10-hour (9 a.m. to 7 p.m.), 15-hour (7 a.m. to 10 p.m.), or longer time period? Would nighttime operation be regularly required, or just be done as needed? These questions are not answered by the FP/DEIR, as discussed below.

Second, the pipeline to the JWPCP is described only as an "18-inch diameter pipeline" that would run from the facility to the JWPCP sewer. The FP/DEIR contains no discussion of the probable route of this pipeline. There is not even any identification of the location where the pipeline would meet the inlet of the JWPCP sewer. Third, the amount of property needed for the truck unloading facility varies in different sections of the FP/DEIR. FP Section 6.7.1.3, for example, states that the "unloading terminal would require a two-acre property . . . ." The Land Use and Planning section of the DEIR, however, states that the facility "would require approximately a 1-acre lot . . . ." DEIR Section 17.4.2.1.

Additionally, the FP/DEIR fails to describe with any particularity the "fail-safe" option of trucking brine waste to the JWPCP facility in Carson. As discussed below, the FP/DEIR also fails to assess the environmental impacts of this option, even though, as recommended in the FP/DEIR, it could supplant the City Terrace neighborhood as the destination for the brine waste.

Such vagueness and inconsistency in description violates the fundamental precept of CEQA, which is to provide decision makers "with information which enables them to make a decision which intelligently takes account of environmental consequences." *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 26. *See also Santiago Co. Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 829 (EIR invalidated for failure to describe facilities needed for project operation). *See also Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 533 (project description in EIR must provide "enough information to ascertain the project's environmentally significant effects,

assess ways of mitigating them, and consider project alternatives.") By not providing even basic information on the size or features of the truck unloading facility or the route of the pipeline, the DEIR does not comply with CEQA's requirements.

2. Failure to Fully Describe Environmental Setting

Another key requirement of CEQA is that the environmental setting for the proposed project must be described. 14 Cal. Code Reg. § 15125(a). This discussion is vital, because it establishes the "baseline" for determining whether changes to the environment from the project are significant. *Id.*

The Environmental Setting discussion in FP Section 2 is entirely inadequate, in that it ignores the environmental setting of the City Terrace neighborhood, even though that neighborhood "is in the vicinity of the project." *Id.* In particular, Section 2 has no discussion of the climactic conditions in the City Terrace neighborhood, its geography and topography (both factors relevant to aesthetics and noise impacts), its geology and seismic issues (relevant to liquefaction zones, as discussed in Section D. 8 below), aesthetics, or demographics.

With respect to the discussion of demographics, the inadequacy of the FP/DEIR is quite stark. For example, it states that the median household income in the Santa Clarita Valley is $89,002 and that only 6% of the population have incomes that place them below the poverty line. FP, page 2-8. By contrast, the median household income in the City Terrace neighborhood is only about $37,000, which places 25% of the population below the poverty line. (See Exhibit 2). There is no discussion of housing prices in the City Terrace neighborhood, but anecdotal evidence suggests it is a fraction of the average $496,000 household value in the Santa Clarita Valley.

Individual sections in the DEIR include environmental setting subsections, but these are inadequate as they apply to the City Terrace neighborhood. For example, the Noise section does not discuss specific noise issues with respect to the City Terrace area. The Geology, Soils and Seismology section does not mention liquefaction issues in the City Terrace neighborhood, but focuses instead on issues in the Santa Clarita Valley. The Energy Resources section mentions only electrical utilities, not fossil fuel resources. In the Transportation and Traffic section, the environmental setting discussion does not list as "Local Access Roadways" in Table 19-1 any of the streets proposed to be used for Alternative 3, or in Table 19-3 or 19-4, those freeways or portions of freeways to be used for Alternative 3, including I-10 and I-5 or the junction of these freeways.

3. Failure to Adequately Address "Fail-Safe" Disposal Location at JWPCP

As noted above, the DEIR must fully analyze all reasonable alternatives to the project. This was not done with respect to Alternative 3, since the DEIR did not analyze the impacts of trucking the brine waste to the JWPCP in Carson. This site was included in the FP/DEIR as a "fail-safe" trucking destination in the event that public opposition or other factors made trucking to the City Terrace neighborhood infeasible. FP at 6-52. Thus, unlike trucking destinations that were discarded for various financial or feasibility reasons (FP at Section 6.6.3.2), the JWPCP destination remains an active alternative for brine disposal. As such, the environmental impacts of the JWPCP destination should have been discussed. The DEIR, however, addresses (and inadequately) only the environmental impacts of the City Terrace destination.

Since the JWPCP was identified in the FP/DEIR as the alternative brine waste trucking destination if the City Terrace neighborhood were not available, CEQA requires that the environmental impacts associated with this "fail-safe" location, should have been discussed.

4. EIR Purpose and Scope (DEIR Section 8)

This section does not adequately address significant environmental impacts raised by Alternative 3, and thus does not fulfill the informational requirements of CEQA.

a. Failure to List All Areas of Controversy: DEIR Section 8.8 requires a listing of "concerns and areas of controversy" but omits any discussion of controversy over using the City Terrace neighborhood for Alternative 3. There is, however, substantial evidence of controversy over the City Terrace destination, as demonstrated by objections raised by some 100 City Terrace residents at an informational meeting held on May 21, 2013 and a public hearing held on June 12, 2013. The residents who spoke (including representatives from the City Terrace Coordinating Council, Inc., Justicia y Paz and the parishioners of St. Lucy's Catholic Church, 1419 N. Hazard Avenue) were opposed to Alternative 3. We also understand that community members submitted comment forms to the SCVSD.

The EIR must reflect this significant controversy, especially as the FP/DEIR recognizes as a significant risk factor for Alternative 3 the inability to obtain discretionary approvals "if there is strong opposition from the local community." (FP/DEIR Executive Summary, page 12.)

b. Failure to List all Required Approvals: The list of required approvals in DEIR Section 8.10 must include a CUP from the County of Los Angeles Department of Regional Planning, which would be required for the construction and operation of a waste disposal facility in an M-2 zoned area (which the DEIR indicates will be the location of the brine off-loading facility). Additionally, Alternative 3 would appear to require a building permit and a grading permit from the County of Los Angeles Department of Public Works.[2] Again, due to the vagueness of the project description, it is difficult for the County to determine with any specificity the need for County permits.

This failure to list all required approvals also affects the accuracy of the Alternatives 2 and 3 Implementation Schedule set forth in the DEIR (Figure 7-5). The requirement to obtain a CUP would delay the implementation of Alternative 3, possibly extending the timetable for this alternative beyond the schedule set forth in Figure 7-5.

5. Aesthetic Impacts (DEIR Section 9)

Section 9 of the DEIR ignores aesthetics impacts in the City Terrace neighborhood. Section 9 concludes that Alternative 3 would have "less than a significant impact" on degradation of existing visual character or quality of the site and its surroundings. DEIR Section 9.4.1.3. This analysis, however, is insufficient and does not take into account several factors.

First, as discussed above, the DEIR contains no description of the brine waste off-loading facility, such as its height, lighting or other characteristics. Thus, the DEIR does not provide a sufficient project description for an adequate evaluation of potential aesthetic impacts. Second, the City Terrace neighborhood to the south and east of the industrial park where the truck unloading facility would be located is at a substantially higher elevation than the park itself. Homes located along Whiteside and Ellison Streets, for example, directly overlook the industrial park and the proposed site of the unloading facility. These residences are located less than 1,000 feet from the proposed site. Additionally, these residences would have a view of the pipeline construction. Similarly, residences located along Herbert Avenue to the southeast of the site also are elevated and have a view into the industrial park. (Photographs showing these sightlines are included in Exhibit 3.)

[2] While this analysis focuses on Alternative 3, other alternatives, including Alternative 2, may require grading and potentially other permits, as well as a zoning change if facilities are located at Site A, as the DEIR notes in Section 18.

The DEIR contained no discussion of these facts, or the possible view impact on the residents of City Terrace due to the construction and operation of the brine disposal facility. These residents are located nearer to the brine waste unloading facility than residents in the Santa Clarita area would be to project facilities in that area, whose views of those facilities were evaluated in the DEIR and where vegetation is available to screen the views.

Finally, the DEIR contained no discussion of the adverse aesthetic impact of Alternative 3 associated with the sight of up to 180 daily tanker trucks travelling along residential streets in the City Terrace neighborhood.

6. Air Quality Impacts (DEIR Section 10)

The discussion of air quality impacts in Section 10 of the DEIR is also deficient and in violation of CEQA. The DEIR does not use localized air impact threshold data, even though this was recommended by the South Coast Air Quality Management District ("SCAQMD") in its response to the NOP. Likewise, the DEIR does not contain a mobile source health risk assessment, even though that study also was recommended by the SCAQMD in its NOP response.

a. Failure to Include Central Los Angeles Regional Monitoring and Localized Significance Thresholds: The discussion of existing regional and local air quality (DEIR Section 10.3.4) focuses only on the Santa Clarita Valley and eastern Ventura County, even though Alternative 3 includes significant facilities and operations in central Los Angeles. Moreover, the DEIR does not use SCAQMD air monitoring data for Central Los Angeles (which includes the City Terrace neighborhood) in considering the air quality impacts of Alternative 3. These data are collected at a monitoring station located at 1630 N. Main Street, Los Angeles, only about two miles from the projected location of the brine disposal facility and pipeline. Table 10-2 must be modified to include air quality monitoring data for the Central Los Angeles monitoring station. Also, the DEIR does not use the Localized Significance Threshold ("LST") figures for Central Los Angeles. In its comments on the NOP, the SCAQMD specifically recommended "calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document." SCAQMD Letter, page 2, February 8, 2012 (included in Appendix 8-B, pages 497-98).

b. Failure to Conduct Mobile Source Health Risk Assessment: The SCAQMD recommended that "in the event the proposed

project generates or attracts vehicular trips, *especially heavy-duty diesel-fueled vehicles*, it is recommended that the lead agency perform a mobile source health risk assessment." *Id.* (emphasis supplied). Obviously, Alternative 3 would involve exactly such multiple trips employing heavy-duty diesel tanker trucks. Significantly, the SCAQMD made that comment in response to an NOP which did not even mention Alternative 3 or any trucking of brine waste.

Despite this recommendation from the SCAQMD, the SCVSD did not conduct a mobile source health risk assessment regarding the impacts of heavy truck traffic on the residents of the City Terrace neighborhood. This omission, in light of the specific SCAQMD recommendation, represents further evidence of the SCVSD's cavalier attitude toward analyzing the environmental impacts of Alternative 3 on the residents of the City Terrace neighborhood. The SCVSD must take care to assess impacts on the already-impacted community of City Terrace under CEQA, as noted by the Attorney General in the White Paper. The County requests that the SCVSD fully examine the air impacts of Alternative 3, including conducting a health risk assessment.

c. Failure to Address Impact of Toxic Air Contaminants: The DEIR's discussion of Toxic Air Contaminant ("TACs") impacts (DEIR at 10-45 to 10-49) also is inadequate and incomplete. In the discussion of construction impacts from TACs emitted by diesel equipment, the DEIR (using language identical to that used to discuss Alternative 2, which is limited to the Santa Clarita Valley area and would have no facilities or operations located in City Terrace) concludes that "the equipment would often be located at a considerable distance from the nearest sensitive receptors." DEIR at 10-46. The DEIR does not attempt to define what constitutes a "considerable distance" from receptors, but in any event, multiple City Terrace residences (as well as the Ramona Gardens housing project) are located within 500 feet of the location of the brine offloading facility and pipeline construction site. The DEIR must evaluate TAC impacts in light of these factors.

Moreover, there is no discussion of the impact of TACs emitted from diesel truck engines during operation of the brine disposal facility. The DEIR simply concludes that because no diesel-powered pumps or generators would be utilized at the brine disposal facility, "no impact would occur." DEIR at 10-48. This conclusion ignores the emissions from up to 180 separate diesel tanker trucks lumbering past multiple City Terrace residences each day. These impacts were required to be discussed in the DEIR and, as noted above, should been the subject of a mobile source health risk assessment, as recommended by the SCAQMD.

d. Failure to Address Odor Impacts: The Initial Study noted that "[t]rucking of brine may result in odor emissions from truck trips. However, the trucks would not idle next to sensitive receptors. As a result, the trucking of brine would not create objectionable odors that would impact a substantial number of people." Initial Study at 11, Appendix at 436. However, this conclusion does not comport with other evidence in the record, finding that at the crucial non-signalized intersection of Herbert Avenue and Whiteside Street, delays of up to nearly two minutes during peak weekday morning hours, and more than half a minute during peak weekday evening hours or Saturdays. Arch Beach Consulting Draft Traffic Impact Analysis ("TIA"), February 26, 2013, Table F.

Delays of this magnitude would result in the idling of diesel engines from up to 18 trucks per hour (with the attendant odor noted in the Initial Study), in the midst of the City Terrace residential neighborhood. The DEIR did not discuss this impact, in violation of CEQA.

7. Energy Resources Impacts (DEIR Section 13)

The DEIR states that the criteria "used to determine the significance of impacts related to energy resources are based on Appendix F of the CEQA Guidelines." DEIR at 13-2. However, the DEIR's discussion of energy impacts ignores specific inquiries required under Appendix F, including consideration of mitigation measures "to reduce the wasteful, inefficient, and unnecessary consumption of energy." Pub. Res. Code § 21100(b)(3). As Appendix F makes clear, "energy" is not limited to electrical energy (which is the major focus of the DEIR), but includes fossil fuels "such as coal, natural gas and oil" (CEQA Guidelines, Appendix F at I(2)). The discussion of energy resources in Section 13 of the DEIR does not comport with the requirements of CEQA.

Pursuant to Appendix F, an EIR should, among other items, describe "[t]otal estimated daily vehicle trips to be generated by the project and the additional energy consumed per trip by mode." CEQA Guidelines, Appendix F, II.A.5. Additionally, the EIR should address the "project's energy requirements and its energy use efficiencies by *amount and fuel type* for each stage of the project including construction, operation, maintenance and/or removal," *id.* at II.C.1 (emphasis supplied), as well as the "project's projected transportation energy use requirements and its overall use of efficient transportation alternatives." *Id.* at II.C.6. Appendix F also requires that potential mitigation include those intended "to reduce wasteful, inefficient and unnecessary consumption of energy" and the potential of "siting, orientation, and design to minimize energy consumption, including transportation energy . . . ." *Id.* at II.D.1-2. Alternatives "should be compared in terms of overall energy

consumption and in terms of reducing wasteful, inefficient and unnecessary consumption of energy." *Id.* at II.E.

These requirements were not followed in the DEIR. While the document identified an estimated energy requirement of 9.6 Gigawatt/hours per year based on a calculation of diesel fuel used in the trucking of brine waste, the DEIR contained no discussion of the per-trip energy consumed by the trucking of brine, nor was there any discussion of what this figure constituted in terms of gallons of diesel fuel consumed and any associated efficiencies (analysis which is required by Appendix F of the CEQA Guidelines). There was no discussion of potential mitigation measures to reduce the consumption of diesel fuel in the hauling of the brine waste or, alternatively, any discussion as to why such mitigation measures were not required, beyond conclusory statements that Alternative 3 "would not . . . cause wasteful or unnecessary consumption of energy." Such conclusions do not meet the requirements of CEQA.

8. Geology, Soils, and Seismicity Impacts (DEIR Section 14)

Section 14 of the DEIR contains no discussion of any potential seismic issues associated with the brine disposal facility in the City Terrace neighborhood, even though City Terrace is located in a known liquefaction zone as identified on the Los Angeles Quadrangle of the State of California Seismic Hazard Zones.

Appendix G of the CEQA Guidelines requires evaluation of whether a project would expose persons or structures to substantial adverse effects involving, among other things, "[s]eismic-related ground fracture, including liquefaction" and evaluation of whether the project would be located "on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in . . . liquefaction . . . ." CEQA Guidelines, Appendix G, VI(a)(iii); (c).

The State of California's Seismic Hazard Zones map, which identifies areas of liquefaction, has identified the proposed location of the brine disposal facility and pipeline as areas of liquefaction. A copy of the Los Angeles Quadrangle Seismic Hazard Zones map, showing the areas of liquefaction in green, is attached as Exhibit 4.

The DEIR contains no evaluation of liquefaction with regard to City Terrace. Section 2 of the FP describes the regional geology and potential seismic hazards *only with respect to the Santa Clarita Valley area.* FP at 2-3 to 2-6, including figures. The only comment in DEIR Section 14 regarding the City

Terrace neighborhood is that since the "brine disposal system would not involve water or mineral extraction," the "[i]mpact would be less than significant." DEIR at 14-15. The DEIR further concluded, erroneously, that Alternative 3 "would not be located on a geologic unit . . . that is unstable." *Id.* In fact, the City Terrace facilities would be located in an identified liquefaction zone. The DEIR has failed to adequately address the geological impacts posed by Alternative 3.

9. Noise Impacts (DEIR Section 18)

The DEIR incorrectly concludes that Alternative 3's noise impacts can be mitigated below a level of significance by redirecting truck traffic from residential areas into commercial areas between 10 p.m. and 7 a.m. In fact, the noise from the tanker trucks, as estimated by the DEIR, would exceed the standards set in the County of Los Angeles Noise Ordinance for daytime hours as well, a significant impact requiring mitigation during daytime hours. Other noise impacts, including vibration and increases in ambient noise, also were ignored or improperly analyzed in the DEIR.

a. Failure to Identify Exceedance of County Noise Ordinance Standards: Pursuant to Appendix G of the CEQA Guidelines, the exposure of persons to noise levels in excess of standards established in a local ordinance is considered to be a "significant" environmental impact. *Id.* at XII.a. The DEIR concluded that noise from heavy brine waste tanker trucks in the City Terrace neighborhood would exceed the nighttime (10 p.m. to 7 a.m.) absolute Los Angeles County noise ordinance standard for residential areas of 65 decibels ("dBA") because the trucks would create 80 dBA of noise within 50 feet while travelling at 35 mph. DEIR at 18-19. The DEIR proposes mitigation (termed "NOISE-3") which would involve use of a route utilizing Mission Road (the "Mission Road route") during nighttime hours. DEIR. *Id.* The DEIR does not, however, find a significant noise impact to City Terrace residences from truck operations during daylight hours.

There are several errors in this analysis. First, the County noise ordinance contains an absolute residential noise standard during the 7 a.m. to 10 p.m. period of **70 dBA**, which is below the 80 dBA caused by the truck traffic. L.A. County Code § 12.08.390(A-B). Second, this standard is not to be exceeded for any time period; for noise which cumulatively lasts for more than one minute in any one hour, the standard is **65 dBA.** Lower decibel standards are imposed for noise lasting for longer periods. Since the truck traffic within the residential streets of City Terrace could involve as many as **18 truck trips per hour** (assuming 10

hours[3] of operation and 180 total round-trip truck trips), the cumulative noise impact will be greater than one minute in any one hour. (It also should be noted that the residences on Herbert Avenue are located on a hill. Trucks descending that hill toward the industrial park or ascending the hill leaving the park will make more noise than if they were driving on level ground).

In any event, neither the Herbert nor Eastern Avenue routes can be used **at any time** without exceeding the standards set in the County noise ordinance. This is a significant impact which cannot be mitigated unless all trucking at all times is directed through the Mission Road route, which is the DEIR's proposed mitigation measure for noise impacts during nighttime hours.

As importantly, the DEIR fails to analyze the separate and independent impacts of the proposed Mission Road route mitigation measure. In particular, this routing would have trucks passing a number of sensitive receptors associated with the County-USC Medical Center, including the Women's and Children's Hospital (located at the intersection of Mission Road and Zonal Avenue), the Pediatric Clinic (located on Mission Road near the intersection with Circle Drive) and the Premature Infant Clinic (located on Griffin Avenue, adjacent to Mission Road).[4] The DEIR makes no mention of the existence of these sensitive receptors, which also serve low-income and predominately minority persons, raising the environmental justice issues discussed earlier. These comments do not address whether such trucking would be allowed pursuant to the City of Los Angeles noise ordinance, since the Mission Road route is located almost entirely within the city. Under CEQA, the DEIR cannot propose mitigation

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[3] In line with its failure to adequately describe the project, the DEIR does not specify when the movement of the tanker trucks would occur. Presumably, trucking would occur during normal working hours, to avoid higher night rates. The DEIR states that "the truck trips would be distributed evenly throughout the day from the hours of 7:00 AM to 10:00 PM." DEIR at 19-15. However, the DEIR also indicates that night traffic might be required. Additionally, the TIA assumes 18 trucks per hour, based on a 10-hour working day of 9 a.m. to 7 p.m. TIA at 9. This is more realistic, since if the drivers of the trucks began their work day in Santa Clarita at 7 a.m., they would not arrive in City Terrace until sometime later. Even if the truck traffic were evenly spread over a 24-hour period, there would be eight truck trips per hour, not four as stated in the DEIR, since the four trucks would pass twice through the neighborhood as they entered and left the unloading facility.

[4] Moreover, for outbound trucks using the Mission Road/Valley Boulevard route, any delay in accessing Valley Boulevard from Vineburn Avenue cannot be mitigated by having those trucks use Herbert Avenue and/or Eastern Avenue, as recommended by the April 3, 2013 Technical Memorandum from Arch Beach Consulting. Those routes pass by residences, and the noise of such traffic would exceed the standards set forth in the noise ordinance, as noted above.

without separately assessing the environmental impacts of that mitigation. 14 Cal. Code Reg. § 15126.4(a)(1)(D).

In addition to issues relating to the noise impacts of truck traffic, the DEIR does not accurately reflect noise impacts from construction of the brine offloading facility and associated pipeline. The DEIR asserts that the highest noise level during construction would be generated by a concrete mixer (85 dBA) working at the proposed facility site along Medford Street, and that because the closest sensitive receptors are 850 feet away, there would be attenuation due to distance to render the impacts below the County noise ordinance. DEIR at 18-18. The closest sensitive receptors, however, are those residences that would be directly adjacent to, or within a short distance of, the construction zone for the 1,500-foot pipeline connecting the truck unloading facility with the JWPCP sewer. At least two residences are located on or adjacent to the Fowler Street right-of-way (3214 and 3216 Whiteside Street), which is believed to be along the route of the pipeline (though the DEIR does not so indicate). The Ramona Gardens housing project is located along the west side of Indiana Street, also near the probable route of the brine waste pipeline. The DEIR does not describe the equipment that would be used to construct the pipeline, nor its probable route, so that construction noise impacts could be assessed. However, the pipeline construction effort would presumably include concrete mixers, jackhammers, and other heavy equipment needed to excavate, install the pipeline and restore the paving. Table 18-9 of the DEIR establishes that numerous pieces of construction equipment would operate at noise levels of greater than 80 dBA at 50 feet.

Moreover, the DEIR erroneously states that construction noise would be subject to the 75 dBA limit for single family residential areas. This limit, however, applies only to "non-scheduled, intermittent, short-term operation (less than 10 days) of mobile equipment." L.A. County Code § 12.08.440(B)(1)(a). According to the DEIR, construction of the brine waste unloading facility would last an "estimated 50 days." DEIR at 19-13. Thus, not the 75 dBA limit but the stricter 60 dBA limit set forth in L.A. County Code § 12.08.440(B)(1)(b) would apply. Construction noise is thus a significant impact, contrary to the finding in the DEIR. In addition, because residences would be located closer to the construction than indicated in the DEIR during construction of the pipeline, such noise would cause an additional significant impact, rather than the "less than significant" impact concluded by the DEIR. DEIR at 18-18.

b. Failure to Assess Excessive Groundborne Vibration: While acknowledging that Alternative 3 would expose persons to excessive groundborne vibration (DEIR at 18-26), the DEIR failed either to identify the extent of that impact with respect to the use of heavy tanker trucks or

to properly analyze the actual truck traffic that would be generated in residential neighborhoods in City Terrace. The SCVSD conducted no vibration study of the impact on the City Terrace neighborhood for inclusion in the DEIR.

In discussing truck movement, the DEIR concluded that "the addition of four truck trips per hour on already heavily traveled roadways would not contribute to a traffic related vibration level that would be perceptible by sensitive receptors beyond the current conditions." DEIR at 18-26. This conclusion is both unsupported and erroneous. First, as noted above, the expected maximum truck traffic through the City Terrance neighborhood would be 18, not 4, trucks per hour. Also, the TIA does not indicate that traffic in City Terrace is necessarily "heavy" at all times (see discussion in 8.c regarding ambient noise impacts) nor does it indicate whether the existing traffic consists of primarily heavy trucks or a less intrusive mixture of automobiles, light trucks, medium trucks and heavy trucks.[5] Thus, there are no factual findings from which the SCVSD could conclude in the DEIR that the "already heavily travelled roadways" would be contributing to existing vibration levels.

Similarly, the DEIR offers only conclusory findings with respect to the vibration impacts associated with construction of the brine unloading facility and pipeline. As noted above, the pipeline presumably would run adjacent to at least two City Terrace residences as well as the Ramona Gardens housing project. No analysis was done of these possible impacts, even though the equipment used to construct the pipeline is presumably known, as is the distance to sensitive receptors. By failing to conduct the required analysis, the DEIR has not met the requirements of CEQA. (And, as noted above, the Mission Road route runs by a number of medical facilities associated with the County-USC Medical Center, which could be adversely impacted by vibration.)

c. Failure to Fully Address Increases in Ambient Noise Levels: CEQA Appendix G, Section XII(c)-(d), requires an assessment of either a "substantial permanent increase in ambient noise levels in the project vicinity" or a "substantial temporary or periodic increase in ambient noise levels in the project vicinity" in both cases, above levels existing without the project.

The DEIR concludes that "[t]he addition of approximately four truck trips per hour during daytime and nighttime hours would potentially impact the

[5] The TIA uses a formula whereby all vehicles are expressed in terms of "Passenger-Car Equivalence," under which a heavy truck equals three passenger cars. TIA at 9. Thus, a rating of 90 PCE could mean either 90 individual passenger cars or 30 heavy trucks.

residents along Herbert Avenue." DEIR at 18-31. As estimated by the TIA, if the tanker trucks run during a 10-hour day, the actual traffic flow would be 18 trucks per hour. The DEIR also indicates, as noted above, that the truck traffic would be "distributed evenly" throughout the day. Even were the flow evenly spread in a 24-hour day, approximately 8 trucks would pass each hour through the City Terrace neighborhood travelling to and from the unloading facility. The DEIR concluded that a nighttime traffic of only four trucks would represent a significant impact to the neighborhood, requiring the use of the alternative Mission Road route. DEIR at 18-32.[6]

The DEIR further concluded that based on the Arch Beach TIA, "the increase in haul trucks would not double the amount of traffic currently traveling along Herbert Avenue," and proposed no mitigation for ambient noise increases during daytime hours. DEIR, at 18-31. A closer examination of the TIA, however, indicates that that analysis focused on peak hourly volumes. Again, the flow of brine trucks is, based on the DEIR, presumed to be constant through the day, seven days per week. A constant stream of haul trucks would represent an increase in ambient noise if existing traffic in non-peak hours is not significant.

The raw traffic count worksheets contained in the TIA Appendix A (ITM Peak Hour Summary charts for traffic counts on January 16, 2013) indicate that there was *no traffic* measured travelling northbound or southbound on Herbert Avenue during the noontime hour. Assuming again that the tanker truck traffic were organized to flow evenly during the 10 working hours between 9 a.m. and 7 p.m., approximately 18 trucks would be travelling on Herbert during the noontime hour, as well as every other hour.

These facts reveal a definite and substantial increase in heavy truck traffic flowing past residences during certain hours of the day or, in the words of Appendix G of the CEQA Guidelines, a substantial "periodic increase in ambient noise levels existing without the project." The DEIR must consider such increases, and if significant, propose mitigation to reduce the impacts below

[6] This impact is itself understated. The DEIR asserts that the impact would be from trucks "three to four times per hour throughout the night." DEIR at 18-31. In fact, due to the round trip required, three would be six to eight noise impacts per hour throughout the night. Also, the Mission Road route alternative would impact its own set of sensitive receptors, those facilities associated with the County-USC Medical Center and identified above, and these impacts are not addressed in the DEIR.

significance. (A similar analysis must be done of the trucking routes using Eastern Avenue and the Mission Road route).

This discussion has focused on impacts to residences in City Terrace. In addition, a church, the Salon del Reino de Los Testigos de Jehova, is located on City Terrace Drive next to the off-ramp from the eastbound 10 freeway. According to the website of the Jehovah's Witness denomination, this church holds a Bible study on Wednesday evenings at 7 p.m. and a Sunday meeting at 9 a.m. Both of these meetings would be disrupted by the noise from heavy tanker trucks exiting from the eastbound 10 Freeway. A Google map showing the location of this church is attached as Exhibit 5. Another church, the Iglesia de Jesucristo Jehova Jireh, Hermanos Menonitas, is located along Herbert Avenue at the intersection of Herbert and Whiteside. This church holds three services per week. A photograph of this church is included in Exhibit 5. The DEIR contains no assessment of the impacts to the congregants of either of these churches, which are other sensitive receptors.

10. Traffic Impacts (DEIR Section 19)

The DEIR fails to address significant impacts of the project on transportation and traffic.

a. Failure to Consider Impacts on Bicycle Lanes: Under Appendix G of the CEQA Guidelines, one factor of significance is whether the proposed project would "[c]onflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities." CEQA Guidelines, Appendix G.XVI(f). The DEIR does not discuss this impact at all, even though the County of Los Angeles Bicycle Master Plan proposes Class II and Class III bike lanes in the heart of the Alternative 3 project area.

As shown on the map available at the County Department of Public Works website at http://dpw.lacounty.gov/pdd/bike/map.cfm, these bike lanes/routes are located on City Terrace Drive and run from the intersection with the I-10 freeway off ramp to Herbert Avenue, on Herbert to its intersection with Medford Street, and on Medford to its intersection with Indiana Street. In addition, bike lanes are also proposed for Eastern Avenue from the point at which it meets the I-10 freeway off-ramp past the point where Eastern veers westward to meet Medford. Thus, these bike lanes are located precisely along the rights-of-way proposed to be used by up to 18 heavy trucks per hour hauling brine for disposal.

The EIR must discuss the impact of Alternative 3's heavy trucking project on these bike lanes and on the County of Los Angeles Bicycle Master Plan.

b. Use of Inaccurate Methodology to Compute Traffic: The County has several comments regarding the methodology employed in the DEIR to compute traffic volumes in order to assess impacts on transportation plans and with applicable congestion management programs.

First, some intersection diagrams shown on Figure 19-6 are not accurate or conflict with the TIA. Box 6, showing the intersection of Eastern Avenue and Medford Street, does not reflect the intersection analyzed in the TIA. See TIA, Figure 13b, Box 6. Box 7, showing the intersection of Eastern and State University, incorrectly reflects northbound Eastern, which has left turn only, left/straight and straight/right lanes. Box 9 is completely in error, and appears to reflect an intersection represented in Box 3 on Figure 19-5, The Old Road and Magic Mountain Parkway. Finally, Box 10, showing the intersection of Campus Road and Ramona Blvd., is incorrect. Southbound Campus should reflect a right turn only and left turn only lane. Eastbound Ramona should reflect two left turn only lanes and a straight through lane. In light of these errors, all related calculations, figures and tables in the DEIR, as well as the TIA, must be revised accordingly.

Additionally, in the TIA, Arch Beach employed the Highway Capacity Manual ("HCM") methodology for analyzing non-signalized intersections. The County's practice is to use the Intersection Capacity Utilization ("ICU") methodology for such intersections. ICU methodology allows an "apples to apples" comparison of all intersections, signalized and un-signalized, and is the methodology typically used by municipalities in Los Angeles County. All traffic analysis in the DEIR and TIA based on the HCM methodology for non-signalized intersections should be redone using the ICU methodology.

The traffic analysis of the Mission Road route did not take into account the specific traffic issues relating to that routing, including the presence of a large parking structure, Lot 10, which outlets onto Mission Road at Workman Street or Lot 4, a surface lot which outlets onto Mission at Sichel Street, one block north of Workman, both of which are associated with the County-USC Medical Center, as well as issues relating to the movement of emergency vehicles to the Medical Center and associated clinics. A map of County-USC Medical Center facilities is included as Exhibit 6.

11. Cumulative Impacts (DEIR Section 20)

The CEQA Guidelines require that an EIR consider the cumulative impacts of the project as well as the effects of past, current and probable future projects. Such a consideration must include a discussion of the geographic scope of the area affected by the cumulative effect and a summary of expected environmental effects to be produced by the projects.

The DEIR purports to assess cumulative impacts in Section 20, but fails to either assess existing projects within City Terrace, including the industrial park where the brine unloading facility would be located, or to include two significant proposed future projects that would involve impacts similar to those of Alternative 3. Those projects both involve expansion of existing waste transfer facilities in the City Terrace industrial park, facilities which involve the trucking of waste and the transfer of that waste into other trucks.

The list of "Cumulative Projects" in DEIR Table 20-1 does not include *any* projects in the City Terrace area: not the two existing waste transfer facilities (which involve the flow of heavy trucks into and out of the industrial park) nor the two proposed future projects currently pending before the Los Angeles County Department of Regional Planning that would expand these waste transfer facilities. (Copies of the applications and project descriptions for these projects are attached as Exhibits 7 and 8.)

The first project (Project No. R2012-00279) is a proposal to modify an existing CUP to allow an increase in waste processing from 750 tons to 1,500 tons per day at the City Terrace Recycling, LLC facility located at 1511-1533 Fishburn Avenue. This facility is located on the west side of Fishburn, approximately 500 feet from the apparent projected location of Alternative 3's brine unloading facility and along the apparent right-of-way for the brine pipeline to the JWPCP sewer. The project proposes to have a peak vehicle flow (inbound and outbound) of 207 vehicles per day, with primary delivery routes to the site including Medford Street, Eastern Avenue and Herbert Avenue (streets also to be used for Alternative 3). The total increase in daily truck traffic from this proposed project would be from 107 to 188 trips, approximately the same volume as maximum estimates of the truck traffic for Alternative 3.

The second project (Project No. R2010-00862) also seeks to modify an existing CUP to allow an increase in the processing of solid and recyclable waste from 750 tons to 1,500 tons per day. This project, the East Los Angeles Recycling and Transfer Station, is located at 1512 North Bonnie Beach Place, between Whiteside Street and Medford Street. The project identifies major roads

providing access to the facility as Herbert Avenue, Whiteside Street, Eastern Avenue, and Knowles Avenue. As noted above, Herbert and Eastern Avenues are also routes proposed to be used for Alternative 3.

The project application estimates that after expansion, there would be a total of 307 vehicle round trips per day, of which 168 will be waste collection vehicles (garbage trucks) and 60 will be semi-trucks with transfer trailers (weighing an average 23 tons per vehicle).

Both of these projects would bring additional heavy trucks into the City Terrace neighborhood. The City Terrace Recycling project is located within 500 feet of the possible location of the brine unloading facility, and is situated along the potential route of the brine waste pipeline. The cumulative effect of these two projects and Alternative 3 on the City Terrace neighborhood would, contrary to the conclusions in Section 20 of the DEIR, exacerbate a number of significant environmental impacts in the neighborhood, including:

-- Aesthetics: The expansion of two waste recycling facilities, along with additional garbage truck traffic, will exacerbate the aesthetics impacts identified in Section D.5 above. The DEIR does not consider these projects in the cumulative impacts analysis.

-- Air Quality: The expansion of the recycling facilities will add to the air impacts to the City Terrace neighborhood, and exacerbate the impacts described in Section D.6 above. The DEIR did not consider these projects in the cumulative impacts analysis.

-- Noise: The additional truck traffic in the neighborhood from the two recycling facility projects would add to ambient noise conditions and increase vibrations and will exacerbate the impacts described in Section D.9 above. The DEIR did not consider the cumulative nature of these projects' impacts on noise.

-- Traffic: The two additional projects propose to use portions of the same routes identified for Alternative 3; neither the DEIR nor the TIA considered these projects in the projection of future traffic growth. The traffic associated with the projects, combined with that associated with Alternative 3, could have a significant impact on the City Terrace neighborhood. These impacts were not considered in the DEIR.

The Attorney General's White Paper, quoted above, emphasizes the importance of assessing cumulative impacts under CEQA as a means of ensuring environmental justice for impacted communities.

E. Issues Regarding Location of DWI Facility

FP Section 7.2.1 indicates that the DWI facility under Alternative 2 would be located at Site A, which, according to Figure 7-4, is located west of the 5 Freeway, on the east and west sides of The Old Road and north of McBean Parkway. This area is largely coextensive with the Valley Oaks Savannah Significant Ecological Area ("SEA No. 64"), a fact acknowledged by the FP. Development in an SEA is subject to review by the SEA Technical Advisory Committee, as also acknowledged by the FP.

In addition, portions of Site A are subject to a dedication of construction rights on Tract No. 45433-02, which gives the County the right to prohibit the construction of buildings or other structures. This dedication is not discussed in the FP/DEIR, though it potentially could affect the ability of the SCVSD to construct the DWI facilities in Site A. The County further notes that the Newhall Land and Farming Company, the owner of land in the SEA, is preparing to grant to the County an easement establishing an oak tree preserve in the SEA, which would further restrict construction in the area.

Any siting of DWI facilities on land subject to specific environmental protections and restrictions must fully comply with all such restrictions. As a general matter, the County has concerns regarding siting of such facilities in SEA No. 64. As discussed in Section C.1 above, Site B for the proposed DWI facility should have been further evaluated, in that it may provide an alternative location appropriate for the facility.

F. Alternative 4 Phase II Issues

Section 6 of the FP states that with respect to the implementation of Alternative 4 Phase II, the "specific brine disposal method would be determined at the time of implementation and could involve a pipeline, DWI or trucking like the alternatives evaluated earlier." FP at 6-59. The FP assumes a daily brine waste load of 200,000 gallons, which still would require multiple brine waste truck trips were the brine disposal option of Alternative 3 chosen by the SCVSD. FP at 7-9. The DEIR does not specifically analyze these disposal options, but each case refers generally to the discussion regarding Alternatives 2 and 3.

In view of these facts, the County's environmental justice and CEQA comments in this letter regarding Alternatives 2 and 3 apply with equal force and are specifically made with respect to Alternative 4 Phase II. Since Alternative 4 Phase II is described in the DEIR as a possible future remedy, required only if Alternative 4 Phase I does not achieve compliance with the Chloride TMDL,

there is considerable uncertainty regarding future project components, including with respect to the disposal of brine waste. The County believes that a subsequent EIR would be required to analyze the environmental impacts of the final proposed Alternative 4 Phase II project, including a full review of alternatives to that project.

Conclusion

This letter summarizes the County of Los Angeles' significant concerns with Alternatives 2, 3 and 4 Phase II with respect to proposed methods for the disposal of brine waste from the Chloride TMDL compliance effort. These concerns relate both to the environmental justice issues raised by sending multiple heavy trucks into a lower-income neighborhood nearly 40 miles from the source of the brine waste and to the serious deficiencies of the FP/DEIR under CEQA.

If you have questions concerning this matter, please contact me, Assistant County Counsel Thomas J. Faughnan at (213) 974-1881, or Principal Deputy County Counsel Judith A. Fries at (213) 974-1923.

Very truly yours,

JOHN F. KRATTLI
County Counsel

By Judith A. Fries
JUDITH A. FRIES
Principal Deputy County Counsel
Public Works Division

JAF:gm

Enclosures

c: Honorable Gloria Molina
Supervisor, First District

Honorable Mark Ridley-Thomas
Supervisor, Second District

Honorable Zev Yaroslavsky
Supervisor, Third District

Honorable Don Knabe
Supervisor, Fourth District

Honorable Michael D. Antonovich
Supervisor, Fifth District

Sachi A. Hamai, Executive Officer
Board of Supervisors

William T. Fujioka
Chief Executive Officer

Leroy D. Baca
Sheriff

Richard J. Bruckner, Director
Department of Regional Planning

Gail Farber, Director
Department of Public Works

Jonathan E. Fielding, M.D., M.P.H., Director and Health Officer
Department of Public Health

Russ Guiney, Director
Department of Parks & Recreation

Mitchell H. Katz, M.D., Director
Department of Health Services

Daryl L. Osby, Fire Chief
Fire Department

Margaret Donnellan Todd, County Librarian
Public Library

[redacted]

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EXHIBIT 2

AMERICAN FactFinder

DP03

SELECTED ECONOMIC CHARACTERISTICS

2007-2011 American Community Survey 5-Year Estimates

Supporting documentation on code lists, subject definitions, data accuracy, and statistical testing can be found on the American Community Survey website in the Data and Documentation section.

Sample size and data quality measures (including coverage rates, allocation rates, and response rates) can be found on the American Community Survey website in the Methodology section.

Although the American Community Survey (ACS) produces population, demographic and housing unit estimates, it is the Census Bureau's Population Estimates Program that produces and disseminates the official estimates of the population for the nation, states, counties, cities and towns and estimates of housing units for states and counties.

Subject	East Los Angeles CDP, California			
	Estimate	Margin of Error	Percent	Percent Margin of Error
EMPLOYMENT STATUS				
Population 16 years and over	91,363	+/-1,735	91,363	(X)
In labor force	55,584	+/-1,490	60.8%	+/-1.1
Civilian labor force	55,540	+/-1,487	60.8%	+/-1.1
Employed	49,525	+/-1,329	54.2%	+/-1.1
Unemployed	6,015	+/-529	6.6%	+/-0.5
Armed Forces	44	+/-53	0.0%	+/-0.1
Not in labor force	35,779	+/-1,234	39.2%	+/-1.1
Civilian labor force	55,540	+/-1,487	55,540	(X)
Percent Unemployed	(X)	(X)	10.8%	+/-0.9
Females 16 years and over	45,212	+/-990	45,212	(X)
In labor force	22,497	+/-972	49.8%	+/-1.9
Civilian labor force	22,497	+/-972	49.8%	+/-1.9
Employed	19,838	+/-911	43.9%	+/-1.8
Own children under 6 years	11,623	+/-853	11,623	(X)
All parents in family in labor force	6,408	+/-663	55.1%	+/-4.7
Own children 6 to 17 years	23,656	+/-1,198	23,656	(X)
All parents in family in labor force	14,031	+/-1,158	59.3%	+/-3.3
COMMUTING TO WORK				
Workers 16 years and over	48,552	+/-1,274	48,552	(X)
Car, truck, or van -- drove alone	29,961	+/-1,092	61.7%	+/-1.6
Car, truck, or van -- carpooled	7,471	+/-676	15.4%	+/-1.3
Public transportation (excluding taxicab)	6,674	+/-606	13.7%	+/-1.2
Walked	1,959	+/-328	4.0%	+/-0.7
Other means	1,233	+/-268	2.5%	+/-0.6
Worked at home	1,254	+/-273	2.6%	+/-0.6
Mean travel time to work (minutes)	28.4	+/-0.7	(X)	(X)
OCCUPATION				
Civilian employed population 16 years and over	49,525	+/-1,329	49,525	(X)

Subject	East Los Angeles CDP, California			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Management, business, science, and arts occupations	6,882	+/-563	13.9%	+/-1.0
Service occupations	10,607	+/-743	21.4%	+/-1.4
Sales and office occupations	12,796	+/-903	25.8%	+/-1.5
Natural resources, construction, and maintenance occupations	6,800	+/-602	13.7%	+/-1.2
Production, transportation, and material moving occupations	12,440	+/-873	25.1%	+/-1.6
INDUSTRY				
Civilian employed population 16 years and over	49,525	+/-1,329	49,525	(X)
Agriculture, forestry, fishing and hunting, and mining	565	+/-193	1.1%	+/-0.4
Construction	4,886	+/-568	9.9%	+/-1.2
Manufacturing	7,457	+/-668	15.1%	+/-1.3
Wholesale trade	2,756	+/-372	5.6%	+/-0.7
Retail trade	6,814	+/-674	13.8%	+/-1.3
Transportation and warehousing, and utilities	3,374	+/-383	6.8%	+/-0.8
Information	521	+/-157	1.1%	+/-0.3
Finance and insurance, and real estate and rental and leasing	1,663	+/-319	3.4%	+/-0.6
Professional, scientific, and management, and administrative and waste management services	4,476	+/-520	9.0%	+/-1.0
Educational services, and health care and social assistance	8,315	+/-621	16.8%	+/-1.2
Arts, entertainment, and recreation, and accommodation and food services	3,718	+/-423	7.5%	+/-0.8
Other services, except public administration	3,459	+/-472	7.0%	+/-0.9
Public administration	1,521	+/-276	3.1%	+/-0.5
CLASS OF WORKER				
Civilian employed population 16 years and over	49,525	+/-1,329	49,525	(X)
Private wage and salary workers	40,089	+/-1,134	80.9%	+/-1.4
Government workers	5,357	+/-549	10.8%	+/-1.0
Self-employed in own not incorporated business workers	3,759	+/-488	7.6%	+/-0.9
Unpaid family workers	320	+/-230	0.6%	+/-0.5
INCOME AND BENEFITS (IN 2011 INFLATION-ADJUSTED DOLLARS)				
Total households	31,073	+/-440	31,073	(X)
Less than $10,000	2,810	+/-330	9.0%	+/-1.0
$10,000 to $14,999	2,485	+/-310	8.0%	+/-1.0
$15,000 to $24,999	5,010	+/-419	16.1%	+/-1.3
$25,000 to $34,999	4,571	+/-373	14.7%	+/-1.2
$35,000 to $49,999	5,337	+/-474	17.2%	+/-1.5
$50,000 to $74,999	5,824	+/-506	18.7%	+/-1.6
$75,000 to $99,999	2,442	+/-284	7.9%	+/-0.9
$100,000 to $149,999	1,926	+/-258	6.2%	+/-0.8
$150,000 to $199,999	552	+/-149	1.8%	+/-0.5
$200,000 or more	116	+/-68	0.4%	+/-0.2
Median household income (dollars)	37,271	+/-1,665	(X)	(X)
Mean household income (dollars)	46,635	+/-1,487	(X)	(X)
With earnings	25,878	+/-529	83.3%	+/-1.3
Mean earnings (dollars)	47,624	+/-1,745	(X)	(X)
With Social Security	7,439	+/-426	23.9%	+/-1.3
Mean Social Security income (dollars)	12,868	+/-450	(X)	(X)
With retirement income	2,914	+/-298	9.4%	+/-0.9
Mean retirement income (dollars)	11,051	+/-1,145	(X)	(X)
With Supplemental Security Income	2,301	+/-296	7.4%	+/-0.9
Mean Supplemental Security Income (dollars)	8,285	+/-578	(X)	(X)
With cash public assistance income	1,897	+/-233	6.1%	+/-0.8

Subject	East Los Angeles CDP, California			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Mean cash public assistance income (dollars)	5,003	+/-580	(X)	(X)
With Food Stamp/SNAP benefits in the past 12 months	3,622	+/-375	11.7%	+/-1.2
Families	25,008	+/-536	25,008	(X)
Less than $10,000	1,950	+/-265	7.8%	+/-1.0
$10,000 to $14,999	1,510	+/-255	6.0%	+/-1.0
$15,000 to $24,999	4,159	+/-429	16.6%	+/-1.6
$25,000 to $34,999	3,675	+/-354	14.7%	+/-1.4
$35,000 to $49,999	4,346	+/-385	17.4%	+/-1.5
$50,000 to $74,999	4,976	+/-433	19.9%	+/-1.7
$75,000 to $99,999	2,167	+/-267	8.7%	+/-1.1
$100,000 to $149,999	1,714	+/-227	6.9%	+/-0.9
$150,000 to $199,999	441	+/-124	1.8%	+/-0.5
$200,000 or more	70	+/-47	0.3%	+/-0.2
Median family income (dollars)	39,136	+/-1,366	(X)	(X)
Mean family income (dollars)	48,571	+/-1,862	(X)	(X)
Per capita income (dollars)	12,628	+/-432	(X)	(X)
Nonfamily households	6,065	+/-467	6,065	(X)
Median nonfamily income (dollars)	18,875	+/-1,858	(X)	(X)
Mean nonfamily income (dollars)	29,401	+/-3,266	(X)	(X)
Median earnings for workers (dollars)	19,474	+/-625	(X)	(X)
Median earnings for male full-time, year-round workers (dollars)	26,341	+/-789	(X)	(X)
Median earnings for female full-time, year-round workers (dollars)	24,554	+/-1,343	(X)	(X)
HEALTH INSURANCE COVERAGE				
Civilian noninstitutionalized population	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Civilian noninstitutionalized population under 18 years	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Civilian noninstitutionalized population 18 to 64 years	(X)	(X)	(X)	(X)
In labor force:	(X)	(X)	(X)	(X)
Employed:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Unemployed:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Not in labor force:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)

Subject	East Los Angeles CDP, California			
	Estimate	Margin of Error	Percent	Percent Margin of Error
PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL				
All families	(X)	(X)	24.0%	+/-1.6
With related children under 18 years	(X)	(X)	31.0%	+/-2.3
With related children under 5 years only	(X)	(X)	25.6%	+/-5.6
Married couple families	(X)	(X)	18.4%	+/-1.9
With related children under 18 years	(X)	(X)	22.5%	+/-2.7
With related children under 5 years only	(X)	(X)	16.9%	+/-6.2
Families with female householder, no husband present	(X)	(X)	37.0%	+/-3.8
With related children under 18 years	(X)	(X)	50.3%	+/-5.1
With related children under 5 years only	(X)	(X)	49.5%	+/-16.7
All people	(X)	(X)	25.3%	+/-1.7
Under 18 years	(X)	(X)	34.8%	+/-2.8
Related children under 18 years	(X)	(X)	34.4%	+/-2.8
Related children under 5 years	(X)	(X)	33.2%	+/-3.9
Related children 5 to 17 years	(X)	(X)	34.9%	+/-2.9
18 years and over	(X)	(X)	21.2%	+/-1.5
18 to 64 years	(X)	(X)	21.6%	+/-1.6
65 years and over	(X)	(X)	18.3%	+/-2.7
People in families	(X)	(X)	23.5%	+/-1.8
Unrelated individuals 15 years and over	(X)	(X)	41.4%	+/-3.9

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

There were changes in the edit between 2009 and 2010 regarding Supplemental Security Income (SSI) and Social Security. The changes in the edit loosened restrictions on disability requirements for receipt of SSI resulting in an increase in the total number of SSI recipients in the American Community Survey. The changes also loosened restrictions on possible reported monthly amounts in Social Security income resulting in higher Social Security aggregate amounts. These results more closely match administrative counts compiled by the Social Security Administration.

Workers include members of the Armed Forces and civilians who were at work last week.

Industry codes are 4-digit codes and are based on the North American Industry Classification System 2007. The Industry categories adhere to the guidelines issued in Clarification Memorandum No. 2, "NAICS Alternate Aggregation Structure for Use By U.S. Statistical Agencies," issued by the Office of Management and Budget.

Census occupation codes are 4-digit codes and are based on the Standard Occupational Classification (SOC). The Census occupation codes for 2010 and later years are based on the 2010 revision of the SOC. To allow for the creation of 2007-2011 and 2009-2011 tables, occupation data in the multiyear files (2007-2011 and 2009-2011) were recoded to 2011 Census occupation codes. We recommend using caution when comparing data coded using 2011 Census occupation codes with data coded using Census occupation codes prior to 2010. For more information on the Census occupation code changes, please visit our website at http://www.census.gov/hhes/www/ioindex/.

While the 2007-2011 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2007-2011 American Community Survey

Explanation of Symbols:

1. An '**' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

AMERICAN FactFinder

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SELECTED ECONOMIC CHARACTERISTICS

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Subject	Los Angeles County, California			
	Estimate	Margin of Error	Percent	Percent Margin of Error
EMPLOYMENT STATUS				
Population 16 years and over	7,663,484	+/-2,212	7,663,484	(X)
In labor force	4,996,242	+/-9,707	65.2%	+/-0.1
Civilian labor force	4,991,192	+/-9,736	65.1%	+/-0.1
Employed	4,501,382	+/-8,618	58.7%	+/-0.1
Unemployed	489,810	+/-5,918	6.4%	+/-0.1
Armed Forces	5,050	+/-460	0.1%	+/-0.1
Not in labor force	2,667,242	+/-10,161	34.8%	+/-0.1
Civilian labor force	4,991,192	+/-9,736	4,991,192	(X)
Percent Unemployed	(X)	(X)	9.8%	+/-0.1
Females 16 years and over	3,921,829	+/-1,548	3,921,829	(X)
In labor force	2,275,872	+/-6,354	58.0%	+/-0.2
Civilian labor force	2,275,144	+/-6,373	58.0%	+/-0.2
Employed	2,052,704	+/-6,286	52.3%	+/-0.2
Own children under 6 years	750,140	+/-3,066	750,140	(X)
All parents in family in labor force	444,820	+/-4,260	59.3%	+/-0.5
Own children 6 to 17 years	1,555,522	+/-3,817	1,555,522	(X)
All parents in family in labor force	1,021,529	+/-5,773	65.7%	+/-0.3
COMMUTING TO WORK				
Workers 16 years and over	4,382,882	+/-8,701	4,382,882	(X)
Car, truck, or van -- drove alone	3,164,442	+/-9,550	72.2%	+/-0.2
Car, truck, or van -- carpooled	485,438	+/-6,367	11.1%	+/-0.1
Public transportation (excluding taxicab)	311,325	+/-4,710	7.1%	+/-0.1
Walked	127,597	+/-3,208	2.9%	+/-0.1
Other means	89,120	+/-2,173	2.0%	+/-0.1
Worked at home	204,960	+/-3,784	4.7%	+/-0.1
Mean travel time to work (minutes)	29.1	+/-0.1	(X)	(X)
OCCUPATION				
Civilian employed population 16 years and over	4,501,382	+/-8,618	4,501,382	(X)

Subject	Los Angeles County, California			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Management, business, science, and arts occupations	1,574,645	+/-9,075	35.0%	+/-0.2
Service occupations	819,289	+/-7,591	18.2%	+/-0.2
Sales and office occupations	1,151,704	+/-7,418	25.6%	+/-0.2
Natural resources, construction, and maintenance occupations	371,828	+/-4,646	8.3%	+/-0.1
Production, transportation, and material moving occupations	583,916	+/-5,907	13.0%	+/-0.1
INDUSTRY				
Civilian employed population 16 years and over	4,501,382	+/-8,618	4,501,382	(X)
Agriculture, forestry, fishing and hunting, and mining	21,643	+/-1,523	0.5%	+/-0.1
Construction	271,945	+/-4,114	6.0%	+/-0.1
Manufacturing	503,000	+/-5,003	11.2%	+/-0.1
Wholesale trade	167,472	+/-2,957	3.7%	+/-0.1
Retail trade	478,438	+/-4,824	10.6%	+/-0.1
Transportation and warehousing, and utilities	235,933	+/-3,891	5.2%	+/-0.1
Information	198,235	+/-3,240	4.4%	+/-0.1
Finance and insurance, and real estate and rental and leasing	300,506	+/-4,071	6.7%	+/-0.1
Professional, scientific, and management, and administrative and waste management services	543,258	+/-5,965	12.1%	+/-0.1
Educational services, and health care and social assistance	909,420	+/-6,201	20.2%	+/-0.1
Arts, entertainment, and recreation, and accommodation and food services	446,515	+/-6,476	9.9%	+/-0.1
Other services, except public administration	272,550	+/-3,719	6.1%	+/-0.1
Public administration	152,467	+/-3,211	3.4%	+/-0.1
CLASS OF WORKER				
Civilian employed population 16 years and over	4,501,382	+/-8,618	4,501,382	(X)
Private wage and salary workers	3,521,345	+/-9,223	78.2%	+/-0.1
Government workers	554,707	+/-6,184	12.3%	+/-0.1
Self-employed in own not incorporated business workers	417,644	+/-4,709	9.3%	+/-0.1
Unpaid family workers	7,686	+/-782	0.2%	+/-0.1
INCOME AND BENEFITS (IN 2011 INFLATION-ADJUSTED DOLLARS)				
Total households	3,218,518	+/-5,569	3,218,518	(X)
Less than $10,000	196,705	+/-2,939	6.1%	+/-0.1
$10,000 to $14,999	188,853	+/-2,717	5.9%	+/-0.1
$15,000 to $24,999	333,405	+/-4,145	10.4%	+/-0.1
$25,000 to $34,999	312,220	+/-3,572	9.7%	+/-0.1
$35,000 to $49,999	412,247	+/-4,307	12.8%	+/-0.1
$50,000 to $74,999	560,364	+/-5,293	17.4%	+/-0.2
$75,000 to $99,999	385,543	+/-4,003	12.0%	+/-0.1
$100,000 to $149,999	439,121	+/-4,571	13.6%	+/-0.1
$150,000 to $199,999	186,110	+/-3,274	5.8%	+/-0.1
$200,000 or more	203,950	+/-2,795	6.3%	+/-0.1
Median household income (dollars)	56,266	+/-237	(X)	(X)
Mean household income (dollars)	81,636	+/-344	(X)	(X)
With earnings	2,678,084	+/-6,176	83.2%	+/-0.1
Mean earnings (dollars)	81,701	+/-365	(X)	(X)
With Social Security	713,450	+/-4,177	22.2%	+/-0.1
Mean Social Security income (dollars)	15,219	+/-66	(X)	(X)
With retirement income	372,515	+/-4,217	11.6%	+/-0.1
Mean retirement income (dollars)	25,738	+/-411	(X)	(X)
With Supplemental Security Income	186,459	+/-2,732	5.8%	+/-0.1
Mean Supplemental Security Income (dollars)	9,449	+/-74	(X)	(X)
With cash public assistance income	124,622	+/-2,189	3.9%	+/-0.1

Subject	Los Angeles County, California			
	Estimate	Margin of Error	Percent	Percent Margin of Error
Mean cash public assistance income (dollars)	5,614	+/-111	(X)	(X)
With Food Stamp/SNAP benefits in the past 12 months	199,495	+/-2,708	6.2%	+/-0.1
Families	2,168,086	+/-7,275	2,168,086	(X)
Less than $10,000	99,782	+/-2,046	4.6%	+/-0.1
$10,000 to $14,999	82,400	+/-2,051	3.8%	+/-0.1
$15,000 to $24,999	211,516	+/-2,931	9.8%	+/-0.1
$25,000 to $34,999	206,042	+/-3,307	9.5%	+/-0.1
$35,000 to $49,999	278,307	+/-3,253	12.8%	+/-0.2
$50,000 to $74,999	380,415	+/-4,111	17.5%	+/-0.2
$75,000 to $99,999	274,378	+/-3,241	12.7%	+/-0.1
$100,000 to $149,999	327,502	+/-4,062	15.1%	+/-0.2
$150,000 to $199,999	145,956	+/-2,830	6.7%	+/-0.1
$200,000 or more	161,788	+/-2,697	7.5%	+/-0.1
Median family income (dollars)	62,595	+/-367	(X)	(X)
Mean family income (dollars)	89,432	+/-485	(X)	(X)
Per capita income (dollars)	27,954	+/-126	(X)	(X)
Nonfamily households	1,050,432	+/-6,339	1,050,432	(X)
Median nonfamily income (dollars)	40,313	+/-333	(X)	(X)
Mean nonfamily income (dollars)	60,722	+/-582	(X)	(X)
Median earnings for workers (dollars)	29,348	+/-144	(X)	(X)
Median earnings for male full-time, year-round workers (dollars)	42,377	+/-211	(X)	(X)
Median earnings for female full-time, year-round workers (dollars)	39,399	+/-282	(X)	(X)
HEALTH INSURANCE COVERAGE				
Civilian noninstitutionalized population	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Civilian noninstitutionalized population under 18 years	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Civilian noninstitutionalized population 18 to 64 years	(X)	(X)	(X)	(X)
In labor force:	(X)	(X)	(X)	(X)
Employed:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Unemployed:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)
Not in labor force:	(X)	(X)	(X)	(X)
With health insurance coverage	(X)	(X)	(X)	(X)
With private health insurance	(X)	(X)	(X)	(X)
With public coverage	(X)	(X)	(X)	(X)
No health insurance coverage	(X)	(X)	(X)	(X)

Subject	Los Angeles County, California			
	Estimate	Margin of Error	Percent	Percent Margin of Error
PERCENTAGE OF FAMILIES AND PEOPLE WHOSE INCOME IN THE PAST 12 MONTHS IS BELOW THE POVERTY LEVEL				
All families	(X)	(X)	13.0%	+/-0.2
With related children under 18 years	(X)	(X)	18.7%	+/-0.2
With related children under 5 years only	(X)	(X)	16.0%	+/-0.6
Married couple families	(X)	(X)	8.2%	+/-0.2
With related children under 18 years	(X)	(X)	11.4%	+/-0.3
With related children under 5 years only	(X)	(X)	8.1%	+/-0.6
Families with female householder, no husband present	(X)	(X)	26.3%	+/-0.4
With related children under 18 years	(X)	(X)	35.8%	+/-0.6
With related children under 5 years only	(X)	(X)	37.9%	+/-1.6
All people	(X)	(X)	16.3%	+/-0.1
Under 18 years	(X)	(X)	23.1%	+/-0.3
Related children under 18 years	(X)	(X)	22.8%	+/-0.3
Related children under 5 years	(X)	(X)	24.6%	+/-0.5
Related children 5 to 17 years	(X)	(X)	22.1%	+/-0.3
18 years and over	(X)	(X)	14.0%	+/-0.1
18 to 64 years	(X)	(X)	14.4%	+/-0.1
65 years and over	(X)	(X)	11.7%	+/-0.2
People in families	(X)	(X)	14.2%	+/-0.2
Unrelated individuals 15 years and over	(X)	(X)	25.6%	+/-0.3

Data are based on a sample and are subject to sampling variability. The degree of uncertainty for an estimate arising from sampling variability is represented through the use of a margin of error. The value shown here is the 90 percent margin of error. The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value. In addition to sampling variability, the ACS estimates are subject to nonsampling error (for a discussion of nonsampling variability, see Accuracy of the Data). The effect of nonsampling error is not represented in these tables.

There were changes in the edit between 2009 and 2010 regarding Supplemental Security Income (SSI) and Social Security. The changes in the edit loosened restrictions on disability requirements for receipt of SSI resulting in an increase in the total number of SSI recipients in the American Community Survey. The changes also loosened restrictions on possible reported monthly amounts in Social Security income resulting in higher Social Security aggregate amounts. These results more closely match administrative counts compiled by the Social Security Administration.

Workers include members of the Armed Forces and civilians who were at work last week.

Industry codes are 4-digit codes and are based on the North American Industry Classification System 2007. The Industry categories adhere to the guidelines issued in Clarification Memorandum No. 2, "NAICS Alternate Aggregation Structure for Use By U.S. Statistical Agencies," issued by the Office of Management and Budget.

Census occupation codes are 4-digit codes and are based on the Standard Occupational Classification (SOC). The Census occupation codes for 2010 and later years are based on the 2010 revision of the SOC. To allow for the creation of 2007-2011 and 2009-2011 tables, occupation data in the multiyear files (2007-2011 and 2009-2011) were recoded to 2011 Census occupation codes. We recommend using caution when comparing data coded using 2011 Census occupation codes with data coded using Census occupation codes prior to 2010. For more information on the Census occupation code changes, please visit our website at http://www.census.gov/hhes/www/ioindex/.

While the 2007-2011 American Community Survey (ACS) data generally reflect the December 2009 Office of Management and Budget (OMB) definitions of metropolitan and micropolitan statistical areas; in certain instances the names, codes, and boundaries of the principal cities shown in ACS tables may differ from the OMB definitions due to differences in the effective dates of the geographic entities.

Estimates of urban and rural population, housing units, and characteristics reflect boundaries of urban areas defined based on Census 2000 data. Boundaries for urban areas have not been updated since Census 2000. As a result, data for urban and rural areas from the ACS do not necessarily reflect the results of ongoing urbanization.

Source: U.S. Census Bureau, 2007-2011 American Community Survey

Explanation of Symbols:

1. An '**' entry in the margin of error column indicates that either no sample observations or too few sample observations were available to compute a standard error and thus the margin of error. A statistical test is not appropriate.
2. An '-' entry in the estimate column indicates that either no sample observations or too few sample observations were available to compute an estimate, or a ratio of medians cannot be calculated because one or both of the median estimates falls in the lowest interval or upper interval of an open-ended distribution.
3. An '-' following a median estimate means the median falls in the lowest interval of an open-ended distribution.
4. An '+' following a median estimate means the median falls in the upper interval of an open-ended distribution.
5. An '***' entry in the margin of error column indicates that the median falls in the lowest interval or upper interval of an open-ended distribution. A statistical test is not appropriate.
6. An '*****' entry in the margin of error column indicates that the estimate is controlled. A statistical test for sampling variability is not appropriate.
7. An 'N' entry in the estimate and margin of error columns indicates that data for this geographic area cannot be displayed because the number of sample cases is too small.
8. An '(X)' means that the estimate is not applicable or not available.

AMERICAN FactFinder

DP-1 | Profile of General Population and Housing Characteristics: 2010

2010 Demographic Profile Data

NOTE: For more information on confidentiality protection, nonsampling error, and definitions, see http://www.census.gov/prod/cen2010/doc/dpsf.pdf.

Geography: East Los Angeles CDP, California

Subject	Number	Percent
SEX AND AGE		
Total population	126,496	100.0
Under 5 years	11,132	8.8
5 to 9 years	10,651	8.4
10 to 14 years	10,962	8.7
15 to 19 years	11,850	9.4
20 to 24 years	10,402	8.2
25 to 29 years	10,055	7.9
30 to 34 years	9,601	7.6
35 to 39 years	9,178	7.3
40 to 44 years	8,520	6.7
45 to 49 years	7,292	5.8
50 to 54 years	6,469	5.1
55 to 59 years	5,311	4.2
60 to 64 years	4,209	3.3
65 to 69 years	3,217	2.5
70 to 74 years	2,456	1.9
75 to 79 years	2,054	1.6
80 to 84 years	1,683	1.3
85 years and over	1,454	1.1
Median age (years)	29.1	(X)
16 years and over	91,385	72.2
18 years and over	86,692	68.5
21 years and over	79,742	63.0
62 years and over	13,307	10.5
65 years and over	10,864	8.6
Male population	62,901	49.7
Under 5 years	5,601	4.4
5 to 9 years	5,415	4.3
10 to 14 years	5,548	4.4
15 to 19 years	6,092	4.8
20 to 24 years	5,400	4.3
25 to 29 years	5,148	4.1
30 to 34 years	4,892	3.9
35 to 39 years	4,706	3.7
40 to 44 years	4,374	3.5
45 to 49 years	3,639	2.9
50 to 54 years	3,167	2.5
55 to 59 years	2,470	2.0
60 to 64 years	1,911	1.5
65 to 69 years	1,467	1.2
70 to 74 years	1,040	0.8

Subject	Number	Percent
75 to 79 years	853	0.7
80 to 84 years	660	0.5
85 years and over	518	0.4
Median age (years)	28.3	(X)
16 years and over	45,128	35.7
18 years and over	42,706	33.8
21 years and over	39,102	30.9
62 years and over	5,636	4.5
65 years and over	4,538	3.6
Female population	63,595	50.3
Under 5 years	5,531	4.4
5 to 9 years	5,236	4.1
10 to 14 years	5,414	4.3
15 to 19 years	5,758	4.6
20 to 24 years	5,002	4.0
25 to 29 years	4,907	3.9
30 to 34 years	4,709	3.7
35 to 39 years	4,472	3.5
40 to 44 years	4,146	3.3
45 to 49 years	3,653	2.9
50 to 54 years	3,302	2.6
55 to 59 years	2,841	2.2
60 to 64 years	2,298	1.8
65 to 69 years	1,750	1.4
70 to 74 years	1,416	1.1
75 to 79 years	1,201	0.9
80 to 84 years	1,023	0.8
85 years and over	936	0.7
Median age (years)	30.0	(X)
16 years and over	46,257	36.6
18 years and over	43,986	34.8
21 years and over	40,640	32.1
62 years and over	7,671	6.1
65 years and over	6,326	5.0
RACE		
Total population	126,496	100.0
One Race	122,353	96.7
White	63,934	50.5
Black or African American	817	0.6
American Indian and Alaska Native	1,549	1.2
Asian	1,144	0.9
Asian Indian	38	0.0
Chinese	387	0.3
Filipino	209	0.2
Japanese	258	0.2
Korean	60	0.0
Vietnamese	73	0.1
Other Asian [1]	119	0.1
Native Hawaiian and Other Pacific Islander	63	0.0
Native Hawaiian	21	0.0
Guamanian or Chamorro	25	0.0
Samoan	8	0.0
Other Pacific Islander [2]	9	0.0
Some Other Race	54,846	43.4

Subject	Number	Percent
Two or More Races	4,143	3.3
White; American Indian and Alaska Native [3]	252	0.2
White; Asian [3]	126	0.1
White; Black or African American [3]	99	0.1
White; Some Other Race [3]	2,988	2.4
Race alone or in combination with one or more other races: [4]		
White	67,508	53.4
Black or African American	1,073	0.8
American Indian and Alaska Native	2,088	1.7
Asian	1,531	1.2
Native Hawaiian and Other Pacific Islander	149	0.1
Some Other Race	58,422	46.2
HISPANIC OR LATINO		
Total population	126,496	100.0
Hispanic or Latino (of any race)	122,784	97.1
Mexican	111,441	88.1
Puerto Rican	264	0.2
Cuban	132	0.1
Other Hispanic or Latino [5]	10,947	8.7
Not Hispanic or Latino	3,712	2.9
HISPANIC OR LATINO AND RACE		
Total population	126,496	100.0
Hispanic or Latino	122,784	97.1
White alone	62,017	49.0
Black or African American alone	495	0.4
American Indian and Alaska Native alone	1,382	1.1
Asian alone	182	0.1
Native Hawaiian and Other Pacific Islander alone	50	0.0
Some Other Race alone	54,693	43.2
Two or More Races	3,965	3.1
Not Hispanic or Latino	3,712	2.9
White alone	1,917	1.5
Black or African American alone	322	0.3
American Indian and Alaska Native alone	167	0.1
Asian alone	962	0.8
Native Hawaiian and Other Pacific Islander alone	13	0.0
Some Other Race alone	153	0.1
Two or More Races	178	0.1
RELATIONSHIP		
Total population	126,496	100.0
In households	126,176	99.7
Householder	30,816	24.4
Spouse [6]	15,497	12.3
Child	47,256	37.4
Own child under 18 years	29,793	23.6
Other relatives	23,302	18.4
Under 18 years	8,800	7.0
65 years and over	2,412	1.9
Nonrelatives	9,305	7.4
Under 18 years	1,157	0.9
65 years and over	418	0.3
Unmarried partner	2,715	2.1
In group quarters	320	0.3
Institutionalized population	146	0.1
Male	88	0.1

Subject	Number	Percent
Female	58	0.0
Noninstitutionalized population	174	0.1
Male	92	0.1
Female	82	0.1
HOUSEHOLDS BY TYPE		
Total households	30,816	100.0
Family households (families) [7]	25,839	83.8
With own children under 18 years	14,257	46.3
Husband-wife family	15,497	50.3
With own children under 18 years	9,263	30.1
Male householder, no wife present	3,238	10.5
With own children under 18 years	1,467	4.8
Female householder, no husband present	7,104	23.1
With own children under 18 years	3,527	11.4
Nonfamily households [7]	4,977	16.2
Householder living alone	3,781	12.3
Male	1,784	5.8
65 years and over	581	1.9
Female	1,997	6.5
65 years and over	1,200	3.9
Households with individuals under 18 years	17,509	56.8
Households with individuals 65 years and over	8,148	26.4
Average household size	4.09	(X)
Average family size [7]	4.33	(X)
HOUSING OCCUPANCY		
Total housing units	32,201	100.0
Occupied housing units	30,816	95.7
Vacant housing units	1,385	4.3
For rent	649	2.0
Rented, not occupied	73	0.2
For sale only	129	0.4
Sold, not occupied	45	0.1
For seasonal, recreational, or occasional use	43	0.1
All other vacants	446	1.4
Homeowner vacancy rate (percent) [8]	1.2	(X)
Rental vacancy rate (percent) [9]	3.2	(X)
HOUSING TENURE		
Occupied housing units	30,816	100.0
Owner-occupied housing units	10,986	35.7
Population in owner-occupied housing units	47,123	(X)
Average household size of owner-occupied units	4.29	(X)
Renter-occupied housing units	19,830	64.3
Population in renter-occupied housing units	79,053	(X)
Average household size of renter-occupied units	3.99	(X)

X Not applicable.

[1] Other Asian alone, or two or more Asian categories.

[2] Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.

[3] One of the four most commonly reported multiple-race combinations nationwide in Census 2000.

[4] In combination with one or more of the other races listed. The six numbers may add to more than the total population, and the six percentages may add to more than 100 percent because individuals may report more than one race.

[5] This category is composed of people whose origins are from the Dominican Republic, Spain, and Spanish-speaking Central or South

American countries. It also includes general origin responses such as "Latino" or "Hispanic."

[6] "Spouse" represents spouse of the householder. It does not reflect all spouses in a household. Responses of "same-sex spouse" were edited during processing to "unmarried partner."

[7] "Family households" consist of a householder and one or more other people related to the householder by birth, marriage, or adoption. They do not include same-sex married couples even if the marriage was performed in a state issuing marriage certificates for same-sex couples. Same-sex couple households are included in the family households category if there is at least one additional person related to the householder by birth or adoption. Same-sex couple households with no relatives of the householder present are tabulated in nonfamily households. "Nonfamily households" consist of people living alone and households which do not have any members related to the householder.

[8] The homeowner vacancy rate is the proportion of the homeowner inventory that is vacant "for sale." It is computed by dividing the total number of vacant units "for sale only" by the sum of owner-occupied units, vacant units that are "for sale only," and vacant units that have been sold but not yet occupied; and then multiplying by 100.

[9] The rental vacancy rate is the proportion of the rental inventory that is vacant "for rent." It is computed by dividing the total number of vacant units "for rent" by the sum of the renter-occupied units, vacant units that are "for rent," and vacant units that have been rented but not yet occupied; and then multiplying by 100.

Source: U.S. Census Bureau, 2010 Census.

DP-1

Profile of General Population and Housing Characteristics: 2010

2010 Demographic Profile Data

NOTE: For more information on confidentiality protection, nonsampling error, and definitions, see http://www.census.gov/prod/cen2010/doc/dpsf.pdf.

Geography: Los Angeles County, California

Subject	Number	Percent
SEX AND AGE		
Total population	9,818,605	100.0
Under 5 years	645,793	6.6
5 to 9 years	633,690	6.5
10 to 14 years	678,845	6.9
15 to 19 years	753,630	7.7
20 to 24 years	752,788	7.7
25 to 29 years	759,602	7.7
30 to 34 years	716,129	7.3
35 to 39 years	715,635	7.3
40 to 44 years	714,691	7.3
45 to 49 years	706,742	7.2
50 to 54 years	662,205	6.7
55 to 59 years	560,920	5.7
60 to 64 years	452,236	4.6
65 to 69 years	323,287	3.3
70 to 74 years	245,183	2.5
75 to 79 years	192,881	2.0
80 to 84 years	152,722	1.6
85 years and over	151,626	1.5
Median age (years)	34.8	(X)
16 years and over	7,714,953	78.6
18 years and over	7,416,397	75.5
21 years and over	6,953,181	70.8
62 years and over	1,322,468	13.5
65 years and over	1,065,699	10.9
Male population	4,839,654	49.3
Under 5 years	330,265	3.4
5 to 9 years	323,676	3.3
10 to 14 years	347,102	3.5
15 to 19 years	385,012	3.9
20 to 24 years	385,393	3.9
25 to 29 years	386,393	3.9
30 to 34 years	360,263	3.7
35 to 39 years	356,358	3.6
40 to 44 years	357,282	3.6
45 to 49 years	349,671	3.6
50 to 54 years	323,330	3.3
55 to 59 years	269,289	2.7
60 to 64 years	212,254	2.2
65 to 69 years	148,148	1.5
70 to 74 years	109,338	1.1

Subject	Number	Percent
75 to 79 years	82,327	0.8
80 to 84 years	60,853	0.6
85 years and over	52,700	0.5
Median age (years)	33.6	(X)
16 years and over	3,764,513	38.3
18 years and over	3,611,506	36.8
21 years and over	3,374,991	34.4
62 years and over	574,176	5.8
65 years and over	453,366	4.6
Female population	4,978,951	50.7
Under 5 years	315,528	3.2
5 to 9 years	310,014	3.2
10 to 14 years	331,743	3.4
15 to 19 years	368,618	3.8
20 to 24 years	367,395	3.7
25 to 29 years	373,209	3.8
30 to 34 years	355,866	3.6
35 to 39 years	359,277	3.7
40 to 44 years	357,409	3.6
45 to 49 years	357,071	3.6
50 to 54 years	338,875	3.5
55 to 59 years	291,631	3.0
60 to 64 years	239,982	2.4
65 to 69 years	175,139	1.8
70 to 74 years	135,845	1.4
75 to 79 years	110,554	1.1
80 to 84 years	91,869	0.9
85 years and over	98,926	1.0
Median age (years)	35.9	(X)
16 years and over	3,950,440	40.2
18 years and over	3,804,891	38.8
21 years and over	3,578,190	36.4
62 years and over	748,292	7.6
65 years and over	612,333	6.2
RACE		
Total population	9,818,605	100.0
One Race	9,379,892	95.5
White	4,936,599	50.3
Black or African American	856,874	8.7
American Indian and Alaska Native	72,828	0.7
Asian	1,346,865	13.7
Asian Indian	79,169	0.8
Chinese	393,488	4.0
Filipino	322,110	3.3
Japanese	102,287	1.0
Korean	216,501	2.2
Vietnamese	87,468	0.9
Other Asian [1]	145,842	1.5
Native Hawaiian and Other Pacific Islander	26,094	0.3
Native Hawaiian	4,013	0.0
Guamanian or Chamorro	3,447	0.0
Samoan	12,115	0.1
Other Pacific Islander [2]	6,519	0.1
Some Other Race	2,140,632	21.8

Subject	Number	Percent
Two or More Races	438,713	4.5
White; American Indian and Alaska Native [3]	30,425	0.3
White; Asian [3]	96,377	1.0
White; Black or African American [3]	38,459	0.4
White; Some Other Race [3]	157,099	1.6
Race alone or in combination with one or more other races: [4]		
White	5,292,966	53.9
Black or African American	948,337	9.7
American Indian and Alaska Native	140,764	1.4
Asian	1,497,960	15.3
Native Hawaiian and Other Pacific Islander	54,169	0.6
Some Other Race	2,356,448	24.0
HISPANIC OR LATINO		
Total population	9,818,605	100.0
Hispanic or Latino (of any race)	4,687,889	47.7
Mexican	3,510,677	35.8
Puerto Rican	44,609	0.5
Cuban	41,350	0.4
Other Hispanic or Latino [5]	1,091,253	11.1
Not Hispanic or Latino	5,130,716	52.3
HISPANIC OR LATINO AND RACE		
Total population	9,818,605	100.0
Hispanic or Latino	4,687,889	47.7
White alone	2,208,278	22.5
Black or African American alone	41,788	0.4
American Indian and Alaska Native alone	53,942	0.5
Asian alone	21,194	0.2
Native Hawaiian and Other Pacific Islander alone	3,630	0.0
Some Other Race alone	2,115,265	21.5
Two or More Races	243,792	2.5
Not Hispanic or Latino	5,130,716	52.3
White alone	2,728,321	27.8
Black or African American alone	815,086	8.3
American Indian and Alaska Native alone	18,886	0.2
Asian alone	1,325,671	13.5
Native Hawaiian and Other Pacific Islander alone	22,464	0.2
Some Other Race alone	25,367	0.3
Two or More Races	194,921	2.0
RELATIONSHIP		
Total population	9,818,605	100.0
In households	9,646,924	98.3
Householder	3,241,204	33.0
Spouse [6]	1,480,665	15.1
Child	3,033,524	30.9
Own child under 18 years	1,963,534	20.0
Other relatives	1,153,878	11.8
Under 18 years	376,956	3.8
65 years and over	175,296	1.8
Nonrelatives	737,653	7.5
Under 18 years	53,445	0.5
65 years and over	33,917	0.3
Unmarried partner	233,599	2.4
In group quarters	171,681	1.7
Institutionalized population	68,682	0.7
Male	43,265	0.4

Subject	Number	Percent
Female	25,417	0.3
Noninstitutionalized population	102,999	1.0
Male	55,363	0.6
Female	47,636	0.5
HOUSEHOLDS BY TYPE		
Total households	3,241,204	100.0
Family households (families) [7]	2,194,080	67.7
With own children under 18 years	1,052,977	32.5
Husband-wife family	1,480,665	45.7
With own children under 18 years	721,804	22.3
Male householder, no wife present	216,368	6.7
With own children under 18 years	92,161	2.8
Female householder, no husband present	497,047	15.3
With own children under 18 years	239,012	7.4
Nonfamily households [7]	1,047,124	32.3
Householder living alone	784,928	24.2
Male	360,530	11.1
65 years and over	76,109	2.3
Female	424,398	13.1
65 years and over	169,632	5.2
Households with individuals under 18 years	1,220,021	37.6
Households with individuals 65 years and over	790,386	24.4
Average household size	2.98	(X)
Average family size [7]	3.58	(X)
HOUSING OCCUPANCY		
Total housing units	3,445,076	100.0
Occupied housing units	3,241,204	94.1
Vacant housing units	203,872	5.9
For rent	104,960	3.0
Rented, not occupied	4,994	0.1
For sale only	26,808	0.8
Sold, not occupied	6,726	0.2
For seasonal, recreational, or occasional use	19,099	0.6
All other vacants	41,285	1.2
Homeowner vacancy rate (percent) [8]	1.7	(X)
Rental vacancy rate (percent) [9]	5.8	(X)
HOUSING TENURE		
Occupied housing units	3,241,204	100.0
Owner-occupied housing units	1,544,749	47.7
Population in owner-occupied housing units	4,878,845	(X)
Average household size of owner-occupied units	3.16	(X)
Renter-occupied housing units	1,696,455	52.3
Population in renter-occupied housing units	4,768,079	(X)
Average household size of renter-occupied units	2.81	(X)

X Not applicable.

[1] Other Asian alone, or two or more Asian categories.

[2] Other Pacific Islander alone, or two or more Native Hawaiian and Other Pacific Islander categories.

[3] One of the four most commonly reported multiple-race combinations nationwide in Census 2000.

[4] In combination with one or more of the other races listed. The six numbers may add to more than the total population, and the six percentages may add to more than 100 percent because individuals may report more than one race.

[5] This category is composed of people whose origins are from the Dominican Republic, Spain, and Spanish-speaking Central or South

American countries. It also includes general origin responses such as "Latino" or "Hispanic."

[6] "Spouse" represents spouse of the householder. It does not reflect all spouses in a household. Responses of "same-sex spouse" were edited during processing to "unmarried partner."

[7] "Family households" consist of a householder and one or more other people related to the householder by birth, marriage, or adoption. They do not include same-sex married couples even if the marriage was performed in a state issuing marriage certificates for same-sex couples. Same-sex couple households are included in the family households category if there is at least one additional person related to the householder by birth or adoption. Same-sex couple households with no relatives of the householder present are tabulated in nonfamily households. "Nonfamily households" consist of people living alone and households which do not have any members related to the householder.

[8] The homeowner vacancy rate is the proportion of the homeowner inventory that is vacant "for sale." It is computed by dividing the total number of vacant units "for sale only" by the sum of owner-occupied units, vacant units that are "for sale only," and vacant units that have been sold but not yet occupied; and then multiplying by 100.

[9] The rental vacancy rate is the proportion of the rental inventory that is vacant "for rent." It is computed by dividing the total number of vacant units "for rent" by the sum of the renter-occupied units, vacant units that are "for rent," and vacant units that have been rented but not yet occupied; and then multiplying by 100.

Source: U.S. Census Bureau, 2010 Census.

EXHIBIT 3

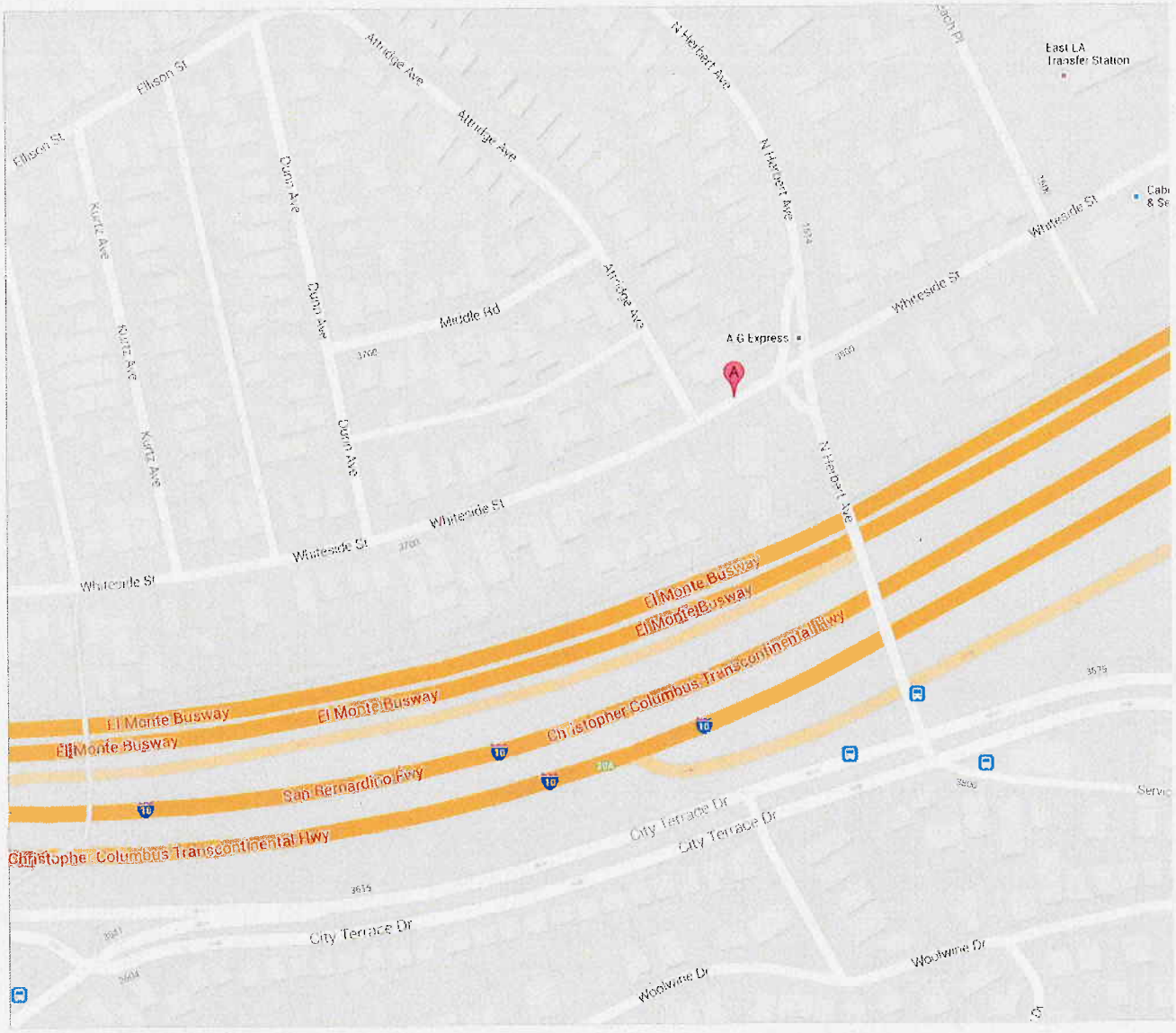

RIP


NO

EXHIBIT 5

To see all the details that are visible on the screen, use the "Print" link next to the map.

Google

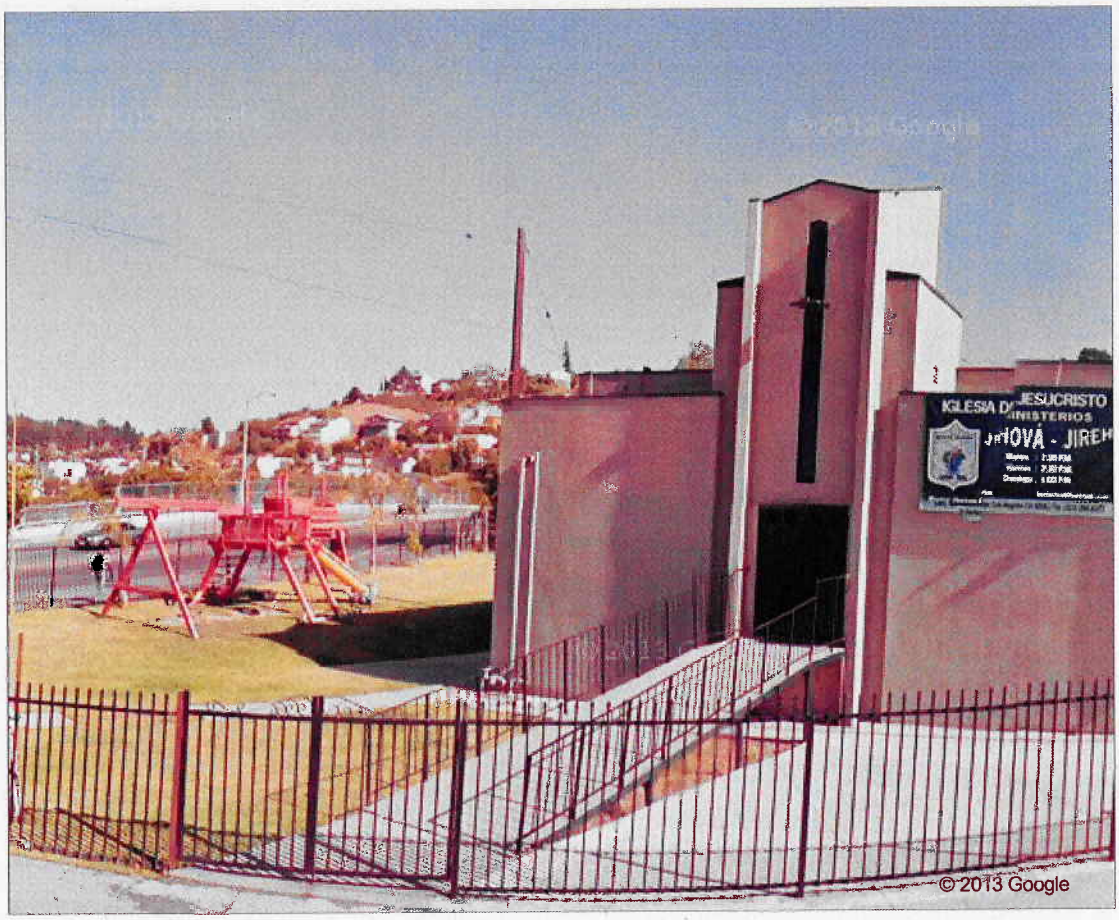


Iglesia De Jesucristo Ministerios Jehova Jireh

Google

Address **3805 Whiteside Street**

Address is approximate



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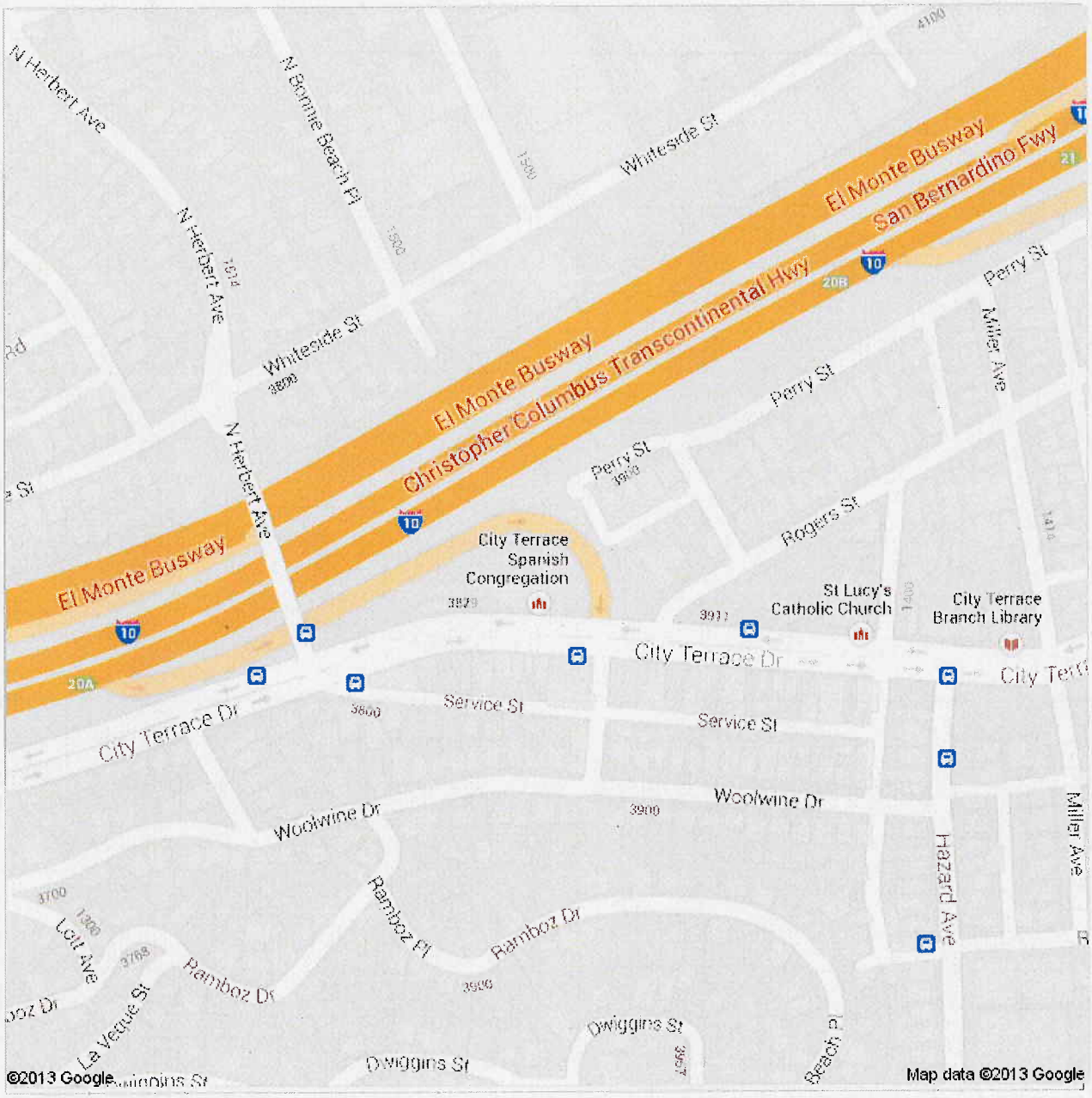

Salon Del Reino De Los Testigos De Jehova

Google

Address **3851 City Terrace Drive**

Address is approximate

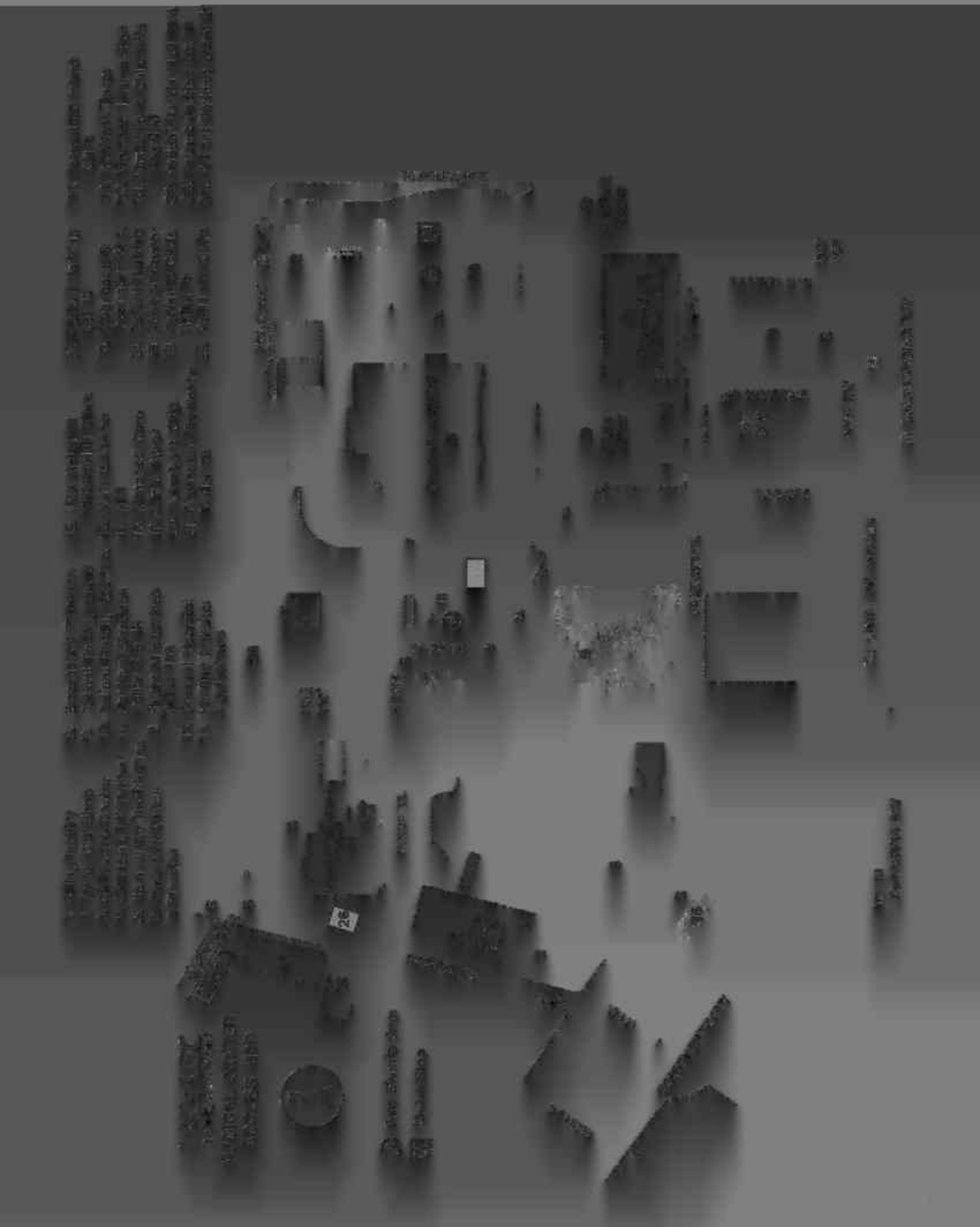

EXHIBIT 7

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

ENVIRONMENTAL ASSESSMENT INFORMATION FORM

PLEASE READ CAREFULLY

- Consult with planning staff to determine if your project is subject to CEQA.
- This questionnaire will assist the county in conducting an Initial Study, for projects subject to the California Environmental Quality Act (CEQA).
- Call 213-974-6438 to schedule a submittal appointment.
- Must be submitted in person.

STAFF USE ONLY

PROJECT NO: R2012-00279
PERMIT NO: RCUP 201200025
ENV: 201200034 CE? Y N CLASS#:
ZONE: M-2 PLAN: I
ESHA/SEA? Y (N) ESHA/SEA:
CSD/TOD? (Y) N CSD/TOD: East LA CSD
SUPV DIST: (1) 2 3 4 5 ZONED DIST: City Terrace
COASTAL? Y (N) HSG PERMIT? Y (N)
RFS? (Y) N RFS NO: 08-00278 34

1. Subject Property (Sujeto Propiedad)

ASSESSOR'S PARCEL NUMBER(S):

APNs: 5224-009-025 and 5224-009-014

SUBJECT PROPERTY ADDRESS OR SITE LOCATION:

1511-1533 Fishburn Ave, Los Angeles, CA 90063

2. Project Description (Descripción del Proyecto) Attach additional sheets if necessary.

The site currently operates as a Material Recovery Facility (MRF) and Transfer Station. The proposed project involves increasing the daily tonnage of 700 tons per day (TPD) to 1,500 TPD, retrofitting an existing canopy for additional tipping and processing, and adding an anaerobic digester onsite to process foodwaste/greenwaste

3. Owner(s) (Dueño/a Registrado)

NAME: Robert Arsenian		PHONE: (323) 780-7150
ADDRESS: P.O. Box 86786		FAX: (323) 780-7164
CITY / STATE: Los Angeles, CA	ZIP: 90086	E-MAIL: ryan@southlanddisposal.com

4. Applicant (Solicitante) If different from owner

NAME:		PHONE:
ADDRESS:		FAX:
CITY / STATE:	ZIP:	E-MAIL:

5. Agent (Agente) If different from owner / applicant

NAME: Ernest V. Clements		PHONE: (818) 267-5100
ADDRESS: 15230 Burbank Blvd, Suite 103		FAX: (818) 782-6712
CITY / STATE: Sherman Oaks, CA	ZIP: 91411	E-MAIL: cclements@clementsenvironmenta

Primary contact regarding this questionnaire? Check one: ☐ Owner ☐ Applicant ☒ Agent

ENVIRONMENTAL ASSESSMENT INFORMATION FORM

Project No.: _____

1. Describe each item as it relates to the PROJECT SITE:

   a. Existing land uses / structures: Existing MRF & Transfer Station with two processing buildings, an office, a maintenance building, and a canopy

   b. Topography / slope: The grading of this site slopes gradually from all directions to a 24" catch basin in the center of the site.

   c. Vegetation: none

   d. Wildlife: none

   e. Surface waters: none

   f. Cultural / historical resources: none

   g. Other:

2. Describe each item as it relates to the SURROUNDING AREA:

   a. Existing land uses / structures: Warehouses, heavy & light manufacturing/M-2, vacant, commercial/M-1, single and multi-family residence/R-2

   b. Topography / slope: A hill is located to the east of the site

   c. Vegetation: A few trees

   d. Wildlife: Maybe a few squirels and birds

   e. Surface waters: none

   f. Cultural / historical resources: none

   g. Other:

3. Will the proposed project change the pattern, scale or character of the surrounding general area?

   ☒ Yes ☐ No If yes, *describe*:

   Increase in trucks coming to and leaving the site, 24/7 processing of material.

4. What steps can be taken to mitigate any adverse effects that may result from this project? List the adverse effect first, then the mitigation measure(s) to reduce that effect.

   Trucks queing on Fishburn Ave - Adding a second scale for quicker weigh in

   More truck traffic - Schedule to avoid peak traffic hours, all trucks are CARB compliant

   24/7 processing - Will take place inside buildings, flashing lights for equipment instead of alarms

5. Have the water, sewer, fire and flood control agencies serving the project been contacted to determine their ability to provide adequate service to the proposed project?

   ☐ Yes ☒ No If yes, attach response.

GEOLOGY

6. Are there identifiable landslide risk, fault lines or zones, liquefaction hazards, expansive soils, or subsidence risks which that would impact the project? Is the project site located on uncompacted fill?

   ☐ Yes ☒ No ☐ Unknown If yes, describe:

7. Does the project propose grading or alteration of topography, or contain slopes over 25 percent?

   ☐ Yes ☒ No If yes, describe:

FLOOD

8. Does the project site contain a drainage course or waterway?

   ☐ Yes ☒ No ☐ Unknown If yes, describe:

9. Is the project located within or contain a floodway, flood plain or designated 100-year flood hazard zone?

   ☐ Yes ☒ No ☐ Unknown If yes, describe:

10. Will the project alter the existing drainage pattern of the site or area? Do offsite drainage facilities have capacity to accommodate site runoff?

☐ Yes ☒ No ☐ Unknown If yes, describe:

FIRE

11. Is the property located within a Very High Fire Hazard Severity Zone (VHFHSZ) or hillsides area with moderately-to-very dense vegetation?

☐ Yes ☒ No ☐ Unknown

12. Distance from project site to nearest fire station: 0.8 miles

NOISE

13. Describe existing noise sources and noise levels that now affect the site (aircraft, roadway noise, railroads, industry, etc.) and how they will affect proposed uses:

The site is located in the M-2 zone (heavy manufacturing), however the existing sources and noise levels will not affect the proposed use of the site.

14. Describe the type of short-term and long-term noise to be generated, including the source and amount:

Trucks travelling to and from the site and station equipment. Existing truck traffic would increase from approximately 107 to 188 trucks per day.

15. Are sensitive receptors, e.g., schools hospitals, residences, located near the project site? How will project noise levels affect adjacent properties and on-site uses?

There are no schools or hospitals in the areas of the facility. Although there are residences on a ridge to the south, these houses are separated from the site by commercial uses along Fowler Street.

16. What methods of soundproofing are proposed?

See attached Noise Control Description

WATER QUALITY

17. Does the project propose the use of a private water well?

☐ Yes ☒ No ☐ Unknown

18. Does the project propose private wastewater disposal or on-site septic systems?

☐ Yes ☒ No

19. How much wastewater will the project generate? ☐ Unknown

No industrial wastewater is generated

20. Are there any bodies of water (including domestic water supplies) into which the site drains?

☐ Yes ☒ No ☐ Unknown If yes, describe:

Site drains to the LA County stromdrain system.

AIR QUALITY

21. Will the project result in increased air emissions or create objectionable odors during or after construction?

☒ Yes ☐ No ☐ Unknown If yes, describe:

There will be an increase in truck traffic and use of equipment on site. See attached Odor Control Description.

GREENHOUSE GASES

22. Will the project generate greenhouse gas (GhGs) emissions, either directly or indirectly, that may have a significant impact on the environment (i.e., on global climate change)? The significance of the impacts of a project's GhG emissions should be evaluated as a cumulative impact rather than a project-specific impact.

☐ Yes ☒ No ☐ Unknown If yes, describe:

The project will have increased truck traffic but due to the increase in recycling rather than landfilling materials, and the reduction in truck traffic going to the landfills, overall GHG emission will be reduced in the region.

23. Will the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases including regulations implementing California AB 32 of 2006, the General Plan policies for implementing actions to reduce greenhouse gas emissions?

☐ Yes ☒ No ☐ Unknown If yes, describe:

The project will be a key facility for jurisdictions to reach AB 341's goal of 75% diversion and mandatory commercial recycling.

BIOTA

24. Is the project located within a Significant Ecological Area (SEA), SEA Buffer, Coastal Zone, coastal Environmentally Sensitive Habitat Resource Area (ESHA), Wildflower Reserve Area, or within a relatively undisturbed natural area?

☐ Yes ☒ No If yes, describe:

25. Will grading, fire clearance or other improvements remove natural habitat or relatively undisturbed area?

☐ Yes ☒ No If yes, describe:

26. Does the project contain coastal sage scrub, oak woodland, sycamore riparian, oak woodlands, wetlands, or other sensitive natural communities?

☐ Yes ☒ No ☐ Unknown If yes, describe:

27. Does the project area contain any known suitable habitat for listed endangered or threatened species, other sensitive species, or a wildlife corridor?

☐ Yes ☒ No ☐ Unknown If yes, describe:

OAK TREES

28. Are protected oak trees present? *(Oak Tree Permit may be required.)*

☐ Yes ☒ No. If yes, indicate :

Total number of protected oak trees to be encroached: _____

Total number of protected oak trees to be removed : _____

29. Would the project, including project buildout, require removal of protected oak trees?

☐ Yes ☒ No

CULTURAL RESOURCES

30. Does the project site contain rock formations indicating potential paleontological resources?

☐ Yes ☒ No ☐ Unknown If yes, describe:

31. Does the project site contain known archeological resources, or historic structures or sites?

☐ Yes ☒ No ☐ Unknown If yes, describe:

AGRICULTURE AND FORESTSRY

32. Does the project conflict with existing agricultural zoning or convert existing farmland to a non-agricultural use?

☐ Yes ☒ No ☐ Unknown If yes, describe:

AESTHETICS

33. Is the project visible from a scenic highway or is it located within a scenic corridor?

☐ Yes ☒ No ☐ Unknown If yes, describe:

34. Will the project impact a riding or hiking trail, ridgeline, shoreline view, significant natural feature or previously undisturbed area?

☐ Yes ☒ No ☐ Unknown If yes, describe

35. Is the proposed use out-of-character in comparison to adjacent uses due to height, bulk or other features?

☐ Yes ☒ No ☐ Unknown If yes, describe:

36. Will the project create sun shadow, light or glare problems?

☒ Yes ☐ No ☐ Unknown If yes, describe:

The 24/7 operation would require lighting at night. All lighting will be shielded to direct the light into the facility and to minimize light that may effect neighboring businesses/residences.

TRAFFIC / ACCESS

37. Estimate the post-construction vehicular traffic generated by the proposed project:

☐ 0 – 50 trips per day ☒ 51 – 250 trips per day ☐ 251 – 500 trips per day ☐ 500 + trips per day

38. Explain what effects the project may have on parking, vehicular traffic circulation, and potential traffic safety hazards in the area:

There will be an increase in truck traffic from 107 to 188 trucks per day. There will be adequate parking spaces for employees onsite. Trucks will park offsite (not on the street).

39. Explain what effect, if any, the project may have on pedestrian or other non-motorized circulation in the area:

There is little pedestrian or non-motorized circulation in the area.

40. Will the project conflict with public transit facilities (bus and rail) or bicycle facilities and bicycle lanes?

☐ Yes ☒ No ☐ Unknown If yes, describe:

SCHOOLS (Residential Projects Only)

41. Indicate school district(s) serving the project:

NOT A RESIDENTIAL PROJECT

42. Estimate the number of school children who will reside in the proposed project: _____

43. Do existing school facilities adequately accommodate the proposed project?

☐ Yes ☐ No ☐ Unknown

Verified by school administration? ☐ Yes ☐ No If yes, attach verification. If no, describe provisions for additional classroom capacity:

ENERGY CONSERVATION

44. Describe energy sources for the proposed project, and proposed designs, materials or features of the project that promote

energy conservation or use of non-fossil-fuel energy sources.

The future Anaerobic Digestor will create CNG fuel that can be used to power the facility's collection trucks. Recycled steel and other materials will be used in construction. Skylights will be installed to provide natural lighting.

HAZARDOUS MATERIALS

45. In the known history of the property, has there been any use, storage, or discharge of hazardous or toxic materials? Examples of hazardous or toxic materials include, but are not limited to, PCB's; radioactive substances; and herbicides, pesticides; paints; fuels, oils, solvents, or other flammable liquids or gases.

☒ Yes ☐ No ☐ Unknown

If yes, please list the materials and describe their use, storage, or discharge on the property, including the dates of use, if known. Also note underground storage of the above:

See attached for information on hazardous materials

46. Will the proposed project involve the temporary or long-term use, storage, discharge, or disposal of hazardous and/or toxic materials, including but not limited to those examples listed above?

☒ Yes ☐ No If yes, provide an inventory of all such materials to be used and method of disposal:

See attached.

NON-RESIDENTIAL PROJECTS

47. Workforce:

a) Number of daily work shifts: 2
b) Operating days and hours: 24/7
c) Maximum number of employees: 18
d) Maximum number of employees per shift: 12

48. Describe end products:

Recyclable materials, municipal solid waste (MSW) residual, compostable material, CNG fuel (future)

49. Describe waste products, including nonhazardous and hazardous waste:

MSW residual from MRF processing, small amounts of hazardous waste found within loads.

50. Method of nonhazardous and hazardous waste disposal:

MSW is transferred to permitted landfills for disposal. See attached for information on hazardous

waste handling and disposal.

51. Do operations require any pressurized tanks?

☒ Yes ☐ No If yes, describe

Propane tanks are used for operating forklifts.

52. Will delivery or shipment trucks travel through residential areas to reach the nearest highway?

☒ Yes ☐ No. If yes, describe.

Primary routes avoid residential areas except for portions of Herbert Ave.

53. Other project or site condition information:

Owner / Applicant / Agent Application Certification (Certificación del Solicitante, Agente o Dueño/a)

By my signature below, I hereby understand and certify the following:

1. I understand that the environmental review associated with the submittal of this form is preliminary, and that after further evaluation, additional information, reports, studies, applications or fees may be required.
2. I understand that, whether or not my application is approved or denied, there may be a partial or no refund of fees paid, and;
3. I understand that submitting inaccurate or incomplete information may result in delays or the denial of my application, and;
4. I certify that the information provided in this form, including attachments, is accurate and correct to the best of my knowledge.

SIGNATURE: Robert M Arsenian DATE: 1/30/2012

PRINT NAME: ROBERT M. ARSENIAN CHECK ONE: ☒ Owner ☐ Applicant ☐ Agent

Archaeological Statement (Declaración Arqueológico)

Under the discretion of the Dept. of Regional Planning, proposed projects may be forwarded to the Archeological Information Center for consultation regarding potential impacts to historical and cultural resources, in order to assure the protection and preservation of Los Angeles County's historic and archeological resources. This review requires a nominal processing fee which will be billed directly to the applicant by Cal State University. By my signature below, I understand this process and possible additional fees.

SIGNATURE (BLUE INK): Ernest V. Clemants III DATE: 1/31/12

PRINT NAME: Ernest V. Clemants III CHECK ONE: ☐ Owner ☐ Applicant ☒ Agent

City Terrace Recycling MRF and Transfer Station CUP
Environmental Assessment Information

Noise Control

1) Noise generated by fixed equipment and on-site vehicular operations

   Equipment dedicated exclusively to on-site use, specifically a forklift, grapple hook loader, and baler, will likely produce noise levels in the range of 60 to 65 dB at the property line. This estimate is based on studies conducted at similar facilities. In industrial use zones, generation of noise at levels of up to 70 dB is normally acceptable. 17,040 sf of the new enclosures are proposed to further mitigate noise impacts.

   Loading and unloading of wastes will take place only within processing buildings that are enclosed on three sides. These buildings are constructed of corrugated steel, and will therefore mitigate noise impacts due to the processing of waste. Concrete block walls will further mitigate the impact of noise to the south and east. The adjacent properties to the north are vacant. The wall of an industrial manufacturing building is located on the western property line.

2) Noise generated off-site by project traffic.

   Traffic generated by the project will consist of diesel, CNG, or gasoline powered collection trucks, 18-wheel transfer trucks, and private vehicles. The actual number will depend on the amount of waste received. The causes and cures for vehicle noise are well known, and the operator will assure that trucks accessing this facility are maintained to high standards, particularly effective mufflers.

   Transfer vehicles will leave and enter the facility on a schedule that is controllable by the operator, and every effort will be made to avoid putting trucks on the road during peak hours.

   Noise from employee vehicles is limited to early morning and late afternoon hours. Employees will be encouraged to car-pool to and from work.

Odor Control

Procedures for handling odiferous loads are as follows:

1) *Trucks determined to be unacceptable for tipping.* These will be refused entry and not allowed to dump their loads. Trucks may be refused entry for excessive odor, leaks, radioactivity, or are suspected of carrying high liquid content (in excess of 50% liquid) loads. The weigh master or facility manager provides the driver with instructions.

2) *Trucks that have been allowed to unload.* Floor spotters direct loader operators to

immediately load odorous waste into transfer trailers. Once loaded into the transfer trailer, the trailer will be immediately tarped to minimize odors being released, and the load hauled to the landfill for disposal.

3) Any odorous material placed on the tipping floor will be treated with odor suppressant.

4) Once the odiferous load is removed from the tipping floor, any residual material on the floor, including liquids, which may contain the odor, will be removed by either absorbing the material into the waste load and loading it into a transfer trailer or using a bleach solution to clean the floor of any odoriferous material.

5) Processing buildings are provided with overhead misting system to counter dust and odors.

6) *Hauling of solid residue from digesters:* After the 21-day digestion process has been completed, the still sealed digesters are aerated to remove the final biogas. This air is vented to the biofilter to remove any odor still present. The wheeled loader will then load the solid organic residue from the digester directly into a transfer truck inside the building. The truck driver will then place a tarp over the load and drive straight to a composting site or other greenwaste handling operation for further processing of the material into mulch or compost.

Hazardous Materials

Hazardous waste is prohibited from entering the facility. However, there may be a need to dispose of a limited quantity of hazardous waste discovered through the facility's load checking program. If hazardous waste is discovered, the facility has procedures for handling, manifesting, and reporting the discovered waste. A temporary hazardous waste storage area is located on the site, and all hazardous waste incidentally recovered from the wastestream is temporarily stored onsite, manifested, and transported off site according to Federal and State regulatory requirements. The facility will report to the County LEA each month, the quantity of hazardous waste transported for disposal off site. Historically, these quantities have been minimal.

CONDITIONAL USE PERMIT BURDEN OF PROOF

Pursuant to Zoning Code Section 22.56.040, the applicant shall substantiate the following:

(Do not repeat the statement or provide Yes/No responses. If necessary, attach additional pages.)

A. That the requested use at the location will not: 1. Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or 2. Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or 3. Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.
See Attached.
B. That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in this Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.
See Attached.
C. That the proposed site is adequately served: 1. By highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of traffic such use would generate, and 2. By other public or private service facilities as are required.
See Attached.

CONDITIONAL USE PERMIT BURDEN OF PROOF

CITY TERRACE RECYCLING MATERIAL RECOVERY FACILITY AND TRANSFER STATION

A. That the requested use at the location will not:

1. *Adversely affect the health, peace, comfort or welfare of persons residing or working in the surrounding area, or*
2. *Be materially detrimental to the use, enjoyment or valuation of property of other persons located in the vicinity of the site, or*
3. *Jeopardize, endanger or otherwise constitute a menace to the public health, safety or general welfare.*

The City Terrace Recycling Material Recovery Facility (MRF) and Transfer Station falls within the Los Angeles County M-2 (heavy manufacturing) zone designation in which a solid waste facility is a conforming use. The property adjacent to the site on the south is a City automobile impound yard. Immediately to the north is a furniture refinishing company, and the Nu Way Recycling Center. On the west the site is bounded by an industrial warehouse. With the exception of a few non-conforming single-family dwellings in the M-1 zone to the south-east, there are no residences within 400 feet of the site.

The property is enclosed on all sides by fences, solid walls, or neighboring buildings.

The alterations to the facility structures will ensure that all processing occurring within buildings to minimize the potential impacts of noise, dust and odor. This proposal includes over 17,000 sf of new enclosures for sound alterations.

The proposed hours of operation will be for 24 hours per day, seven days per week. However, trucking hours (both incoming collection trucks and transfer trucks going out) will be limited to 6:00 a.m. to 6:00 p.m. Monday through Saturday.

All lighting will be shielded to direct the light into the facility and not into the surrounding neighborhood or the sky.

To reduce noise impacts at night, facility equipment such as wheeled loaders and forklifts will have backup alarms turned off and will use flashing safety lights instead.

For safety reasons, this facility does not accept loads from the public; nor does this facility include a buyback recycling center for the same safety reason.

B. *That the proposed site is adequate in size and shape to accommodate the yards, walls, fences, parking and loading facilities, landscaping and other development features prescribed in the Title 22, or as is otherwise required in order to integrate said use with the uses in the surrounding area.*

The 1.6-acre property is developed with an existing MRF and transfer station, a two-story office building, and a vehicle maintenance building. The site is fully paved and enclosed with buildings, solid metal fences, or solid walls. A 30-ft solid masonry concrete tilt-up building is located on an adjacent property to the west of the property line.

The existing canopy located to the north of the transfer processing building will be converted to a 6,240 sf, three-sided building to house construction and demolition debris (C&D), inert material, greenwaste, foodwaste, and other material processing. In Phase II of the project a 3,300 sf "mini" anaerobic digestion system will be constructed along with a 7,320 sf building for tipping, and a small CNG fueling station.

The site is of adequate size and shape to accommodate large trucks, and the on-site, one-way traffic flow pattern minimizes vehicle crossovers. Facility personnel are available to direct incoming collection vehicles and outgoing transfer vehicles during hours of high traffic volume. The facility has an attendant present during all operating hours.

C. *That the proposed site is adequately served:*
   1. *By highways or streets of sufficient width, and improved as necessary to carry the kind and quantity of traffic such use would generate, and*
   2. *By other public or private service facilities as are required.*

The site is approximately 1/4 mile north of the I-10 (San Bernardino) Freeway and 1.25 miles west of the I-710 (Long Beach) Freeway. Primary routes of delivery to the site in addition to these Freeways are: Medford Street, Eastern Ave, Herbert Ave, and Fowler Street.

Los Angeles County
Department of Regional Planning

Planning for the Challenges Ahead

04-002917

ZONING PERMIT APPLICATION

PLEASE READ INSTRUCTIONS CAREFULLY

The following information is necessary for all applications. Failure to provide accurate and complete information will delay review. Applications must be submitted in person by appointment only. Call (213) 974-6438 to schedule an appointment.

FOR STAFF USE ONLY

Permit No.: RCUPT2010 00073

Project No.: R2010-00862-(1)7

RENV / Exempt: RENVT201000058.

Zone: M-2 Plan/Land Use: ELA Plan Cat. I

ESHA/SEA: N/A

CSD/TOD: ELA

Sup. Dist.: 1st Zone Dist.: City Terrace

1. Subject Property *(Sujeto Propiedad)*

Assessor's Parcel Number(s) (Attach additional sheets if necessary):
5224-026-030, 029, 021

Property Address(es) or Location(s):
1512 North Bonnie Beach Place, East Los Angeles, 90063

All existing and proposed structures and gross square footage:

Ex. Transfer Facility - 18,520 sf.; Ex. Office - 750 sf.; Pr. Office - 750 sf.

2. Project Description and Proposed Use *(Descripción del Proyecto y El Uso Propuesto)*

Attach additional sheets if necessary.

See attached Project Description Document

3. Owner(s) *(Dueño/a Registrado)*

Name: **Consolidated Disposal Services** (Nick Canisius)		Phone: **(562) 347-4000**
Address: **12949 East Telegraph Road**		Fax:**(562) 347-4051**
City: **Santa Fe Springs**	Zip: **90670**	E-mail:

4. Applicant *(Solicitante)* If different from owner

Name:		Phone:
Address:		Fax:
City:	Zip:	E-mail:

5. Agent *(Agente)* If different from owner/applicant

Name:		Phone:
Address:		Fax:
City:	Zip:	E-mail:

6. Project and Property Data *(Datos de la Propiedad y Proyecto)*

EAST LOS ANGELES
RECYCLING AND TRANSFER STATION

PROJECT DESCRIPTION

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EAST LOS ANGELES
RECYCLING AND TRANSFER STATION

PROJECT DESCRIPTION

SECTION 1: FACILITY OVERVIEW

1.1 INTRODUCTION

The East Los Angeles Recycling and Transfer Station ("ELARTS") is a permitted and operating large-volume solid waste and recyclable material transfer station. It is located at 1512 North Bonnie Beach Place, in an unincorporated portion of Los Angeles County known as East Los Angeles. The facility is owned and operated by Consolidated Disposal Services ("Consolidated"), a wholly owned subsidiary of Republic Services, inc. ("Republic").

ELARTS is currently designed and permitted to receive and process over 700 tons per day ("TPD") of mixed municipal solid waste ("MSW"), including recyclable materials under Conditional Use Permit ("CUP") Nos. 95-240-(1) and 00-145-(1), issued by the County of Los Angeles Department of Regional Planning (the "DRP") and Solid Waste Facility Permit ("SWFP") No. 19-AA-0845[1], issued by the California Integrated Waste Management Board (the "CIWMB").

The facility presently serves the surrounding communities within Los Angeles County with solid waste and recycling services (i.e., receiving, processing, consolidating and transporting MSW and recyclables). Without ELARTS, some local communities could be forced to haul waste directly from the point of collection to the closest available landfill which presents problems related to traffic, air emissions and higher disposal costs. ELARTS decreases these potential impacts by reducing (through recycling) and consolidating the bulk of refuse destined for landfill disposal.[2]

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[1] A Solid Waste Facility Permit application with the required Report of Station Information ("RSI") was submitted to the County of Los Angeles Department of Health Services Solid Waste Management Program, the authorized Local Enforcement Agency ("LEA"), in November 1998. It was deemed complete by the LEA and forwarded to the CIWMB for their consideration in February 1999. The CIWMB approved the application and the RSI in March 1999. The LEA was notified of a change in ownership in January 2000. A Change of Ownership application was submitted and approved by the LEA in March 2000. As part of this application, relevant pages of the RSI (reflecting the operator/owner change) were also submitted to and approved by the LEA. This document has been updated to reflect the approved increase in the maximum daily permitted capacity

[2] The County of Los Angeles Siting Element ("Siting Element") has projected a shortfall in permitted landfill capacity in the County within next few years. As local and regional landfills close, there is an increasing need for regional transfer and material recovery facilities, like ELARTS, to be expanded or developed to economically and efficiently transport MSW to more distant processing and/or disposal facilities.

PROJECT DESCRIPTION

This Project Description provides the design and operation of the ELARTS facility to support the increase in tons received from 700 TPD to 1,500 TPD. The property, buildings and all equipment are owned and operated by Consolidated Disposal Service.

Name of Station:	East Los Angeles Recycling and Transfer Station
Facility Address:	1512 North Bonnie Beach Place Los Angeles, California
Land Owner:	Consolidated Disposal Service L.L.C. 12949 Telegraph Road Santa Fe Springs, CA 90670
Operator:	Consolidated Disposal Service L.L.C. 12949 Telegraph Road Santa Fe Springs, CA 90670

1.2 SITE LOCATION

ELARTS is located at 1512 North Bonnie Beach Place in an unincorporated portion of Los Angeles County known as East Los Angeles. The facility is located on the north side of Whiteside Street between North Bonnie Beach Place and Knowles Avenue. The approximately 1.3 acre site is located in an area zoned for heavy industry (M-2) and is consistent with Los Angeles County's General Plan.

Major roads providing access to the facility are Interstates 10 and 710, Herbert Avenue, Whiteside Street, Eastern Avenue, and Knowles Avenue. Access to ELARTS by solid waste collection vehicles is from Whiteside Street. Access to ELARTS by transfer trucks is via Knowles Avenue.

1.3 GENERAL SITE DESCRIPTION

The ELARTS facility includes the following major components:

- Administration/Operation Offices
- Transfer Station Building
- Scalehouse and Scale
- Below-Grade Tunnel for Waste Transfer Vehicles

A detailed description of the facility and facility operations are provided in Section 3, titled "*Operations Plan.*" The facility consists of an approximately 19,000 square foot enclosed transfer building which includes two administration/operation offices, a break room for the employees and separate restrooms for women and men.

1.4 ADJACENT LAND USES

Adjacent land uses to the north, south, and east of ELARTS are zoned industrial. Existing uses to the west are a mix of commercial, industrial and non-conforming residential uses.

The residential structures across from the facility on North Bonnie Beach Place are approximately 75-100 feet from the western property line of ELARTS. There are several residential uses within 300 feet of the site on Whiteside Street, west of North Bonnie Beach Place. These uses are separated from the site by industrial uses on both the northwest and southwest corners of North Bonnie Beach Place and Whiteside Street. Industrial structures to the south and west are approximately 50 feet from the respective property lines. An industrial structure north of the project site is less than 20 feet from the northern property line of the project site.

1.5 CONSISTENCY

The subject property and immediately surrounding area are classified "Industrial" on the East Los Angeles Community General Plan. This classification is described as being suitable for "... larger scale industrial uses such as manufacturing, large warehouses, and research and development." Waste recovery and transfer stations are not specifically addressed by the Plan. Under the existing zoning classification (M-2), a CUP is required to permit the proposed project.

1.6 SERVICE AREA

The facility primarily serves the surrounding communities in and around Los Angeles County. Consolidated is the primary customer of the facility and presently collects solid waste, recyclables and green waste from the surrounding residential communities and commercial business, including Alhambra, Downtown Los Angeles, East Los Angeles (unincorporated County portion), Montebello, Monterey Park, Pasadena and Rosemead.

1.7 NATURE AND QUANTITY OF WASTES

1.7.1 Waste Types

Only non-hazardous MSW and recyclables are accepted at ELARTS. This includes MSW generated by the residential and commercial sectors and includes self-haul wastes. In addition, source-separated recyclable materials from curbside collection programs, commercial recycling programs, separate yard waste collection, or other programs are accepted at the facility.

A majority of the incoming materials consists of MSW which are processed, consolidated and transferred to an additional processing facility or a landfill, via transfer trucks with trailers.

Less than five (5) percent, of the incoming materials consist of green materials (grass and brush). These materials are transferred into transfer vehicles and sent directly to a green material processor (either mulching or composting). ELARTS recovers/receives five (5) to ten (10) percent, of recyclable materials. A majority of the recyclable materials are from source separated collection (residential and commercial programs). Some high-value recyclable materials are recovered from the incoming waste stream, manually via floor sorters.

No designated, special, untreated medical, liquid or hazardous wastes are accepted at ELARTS. However, it is not unusual for such items to occasionally show up at solid waste facilities. As a result, and in accordance with Title 22 of the California Code of Regulations, a Hazardous Waste Load Check Program has been implemented to enforce this policy. To ensure that radioactive materials are not accepted at ELARTS, a radiation detection device is present at the scalehouse.

1.7.2 Waste Quantities

Design Capacity

The facility was originally designed and constructed to handle a peak daily throughput of over 700 TPD. The proposed physical changes to the facility including a 20% increase in the land due to the purchase of an adjacent parcel were required in order to accommodate the proposed increase in the maximum permitted capacity to 1,500 TPD.

Permitted Capacity

The facility is currently permitted to operate under Conditional Use Permit Nos. 95-240-(1) and 00-145-(1) (issued by the County of Los Angeles Department of Regional Planning) and Solid Waste Facility Permit ("SWFP") No. 19-AA-0845 (issued by the California Integrated Waste Management Board) to process up to 700 TPD of mixed municipal solid waste (MSW), including recyclables.

Average Daily Throughput

The facility currently receives, processes and transfers approximately 700 tons of material each weekday. Consolidated Disposal is requesting an increase to 1,500 TPD.

Unusual Peak Loadings

The transfer station building has been designed to accept and provide temporary storage for unusual peak loadings. The facility was designed and constructed to have a peak capacity of over 700 tons of materials each day. During peak loading periods, station personnel are instructed to move vehicles as quickly and as safely as possible, and all tipping floor stalls and space are used. Unusual peak loading or emergencies will be handled at the facility by adding labor and/or equipment, and/or extending the length of shifts.

Average Loading Five Year Projection

Table 1 presents a five year projection of the average annual loading for ELARTS. Based on receiving a maximum of 1,500 TPD, six days per week, the anticipated annual amount of material received at ELARTS will be 468,000 tons. This annual projection is an estimate only, and may differ as a result of new or revised waste hauling contracts, legislative mandates, or changes to the available landfill disposal capacity and tipping fees.

TABLE 1
Projected Annual Loading

	Average Tons Per Day	Average Tons Per Year [1]
2010	1,500	468,000
2011	1,500	468,000
2012	1,500	468,000
2013	1,500	468,000
2014	1,500	468,000

Notes:
1 Based on 700 TPD x 312 Days Per Year (Six Days Per Week x 52 Weeks per Year)

The average weekly tonnage is expected to vary by five (5) to ten (10) percent. Seasonal variations may affect the averages by as much as 10 to 20 percent. Under no circumstance will the maximum daily tonnage of 1,500 TPD be exceeded.

1.8 DESIGN CALCULATIONS

The following information was developed to substantiate the facility's ability to handle the proposed maximum design capacity of 1,500 TPD, without causing environmental harm or safety problems.

1.8.1 Station Capacity

The following assumptions and calculations support the facility design with respect to vehicle loading and unloading:

- **Collection Vehicle Weigh-in/Off-loading** - Assuming 60 seconds to weigh-in, approximately 60 vehicles could weigh-in per hour. This capacity exceeds the maximum hourly number of collection vehicles (40 to 60) and self-haul vehicles (up to 10) expected at the maximum capacity of 1,500 TPD. Assuming a turnaround time of 5 to 7 minutes to weigh-in, back-up, maneuver, tip and (in some cases) weigh-out, and considering there is space for at least four (4) commercial vehicle tipping lanes and one lane for self-haul vehicles, the total number of vehicles able to unload at the facility per hour is estimated to be approximately 40 to 60. The breakdown per hour, is as follows: Commercial collection vehicles (35 to 50), self-haul vehicles (up to 10).

- **Solid Waste Storage** - The area available for waste storage at the tipping area is approximately 16,100 square feet (approximately 115' x 140'), and has the capacity to store the maximum hourly tonnage of 205 tons [(25 Commercial Collection Vehicles x 8 tons per vehicle) + (5 Self-haul vehicles x 1 ton per vehicle)], with a depth of approximately 2.75 to 3.0 feet (assuming a conservative density on the floor of 250 pounds per cubic yard).

  Maximum Hourly Tonnage
  205 tons = 1,640 cubic yards

  Waste Storage Capacity
  16,100 s.f. x 2.76' = 44,436 cubic feet = 1,645.78 cubic yards

- **Queuing** - In the event queuing is necessary, up to fifteen (15) collection vehicles can queue between the entrance and the scale. Given the quick 60 second weigh-in time, this should be sufficient to ensure that all queuing occurs onsite. If necessary, another queue can be established on-site between the scales and the transfer floor to accommodate an additional three collection trucks.

- **Waste Transfer** - Using the transfer tunnel, one transfer truck can be loaded with waste residue. Based on a loading time of six minutes per vehicle, approximately 10 trucks per hour can be loaded. This equates to approximately 230 tons per hour (10 trucks per hour x 23 tons per truck).

Under any foreseeable circumstance, all 1,500 TPD of waste can be transferred within the 48-hour regulatory requirement. However, it is anticipated that all 1,500 TPD will be transferred within 24 hours.

1.8.2 Waste Processing Operations

The following assumptions and calculations support the design with respect to the sorting and processing operations at the ELARTS facility. These assumptions could change during the course of the project. Generally, onsite recovery of selected materials is achieved by manual floor sorting commercial and self-haul loads containing a high percentage of recyclable (recoverable) materials. These loads include: residential and commercial curbside collected recyclable materials, C&D debris, and some source-separated yard waste that are transferred directly to off-site recycling or composting operations (e.g., no composting onsite).

- **Floor Sorting** - Each employee is able to manually sort approximately 2.0 tons per 8-hour shift from the tipping floor.
- **C&D Material Processing** - C&D debris is sorted using loaders and floor sorters to recover recyclables.
- **Wood and Yard Waste Processing** - Source-separated wood and yard waste is transferred and shipped off-site for processing.

1.9 TYPES AND NUMBERS OF VEHICLES

A variety of different vehicle types use ELARTS, ranging from automobiles to transfer trucks with trailers. Table 2 presents the types of vehicles that use the facility.

TABLE 2
Types of Vehicles Anticipated at the Facility

Vehicle Type	Transporting
Trash/Recyclable Collection Trucks and Public Self-Haul vehicles	Incoming MSW, including recyclable materials.
Transfer Trucks with Trailers	Outgoing Waste Materials (additional processing/recovery/and disposal)
Semi-trucks; Roll-off trucks; Flatbed trucks; Stake bed trucks	Outbound Recovered Materials
Automobiles, Pick-up trucks, School buses	Employees and Visitors

It is estimated the traffic volume at ELARTS, at the peak design capacity of 1,500 TPD, would be approximately 320 vehicle round-trips per day. Table 3 summarizes the type and number of vehicles anticipated if the facility received a maximum of 1,500 TPD.

TABLE 3
Estimated Traffic Volume

Vehicle Type	Vehicle Round-Trips Per Day
Refuse Trucks	
Collection Vehicles (avg. 8 tons per vehicle)	168
Self-Haul Vehicles (avg. 1 ton per vehicle)	60
Semi-Truck with Transfer Trailers (avg. 23 tons per vehicle)	60
Recycled Materials Trucks (avg. weight varies by material type)	6
Employee Vehicles	8
Visitor Vehicles	5
TOTAL	**307**

The County of Los Angeles Department of Public Works Traffic and Lighting Division stated they "do not expect the proposed project will have a significant impact," based on a review of the request to increase the maximum permitted capacity to 1,500 TPD.

To ensure that no off-site parking will occur, there are 20 existing and 4 proposed on-site parking spaces to accommodate employee and visitor vehicles. No additional parking spaces are needed or required in order to accommodate the request to increase the maximum permitted capacity to 1,500 TPD. Additionally, collection and transfer trucks are parked at a separate location and are not affected by the proposed capacity increase.

SECTION 2: REGULATORY REQUIREMENTS

The following regulatory requirements apply to the ELARTS Facility:

- **Conditional Use Permit** – The facility is currently operating under Conditional Use Permit Nos. 95-240-(1)) and 00-145-(1) issued by the Los Angeles County Department of Regional Planning ("DRP").

- **Environmental Documentation** - The DRP conducted a review of the project under the California Environmental Quality Act ("CEQA") for each CUP (Nos. 95-240 and 00-145). Pursuant to Section 15025 (b) (2) of the State CEQA Guidelines, these documents were submitted to the State Clearinghouse for circulation. A Mitigated Negative Declaration (State Clearinghouse No. 99011016, filed January 7, 1999) was issued for CUP No. 95-240. A Negative Declaration (State Clearinghouse No. 2001021096, filed February 22, 2001) was issued for CUP No. 00-145.

- **Finding of Conformance** ("FOC") - The Los Angeles County Solid Waste Management Task Force revised the FOC for ELARTS on 15 January 1998. Currently, ELARTS is listed in the Los Angeles County Countywide Integrated Waste Management Summary Plan and in the Non-disposal Facility Element. The County Department Public Works has stated "the proposed expansion is generally consistent with the goals and policies established in the Los Angeles County Countywide Integrated Waste Management Plan, approved by CIWMB on June 23, 1999.

- **Storm Water Permit** - The facility has a Notice of Intent for a General Industrial Storm Water Permit (or NPDES) WDID 419I015632 on file with the State Water Resources Control Board ("SWRCB"). The Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Program Plan (MPP) will be updated to reflect the new conditions.

- **Waste Discharge Requirements** - According to the State Water Resources Control Board, a transfer station is exempt from provisions of Title 23 of the California Code of Regulations, pursuant to Section 2511; and therefore the facility is not required to adopt Waste Discharge Requirements.

- **Industrial Wastewater Discharge Permit** - The facility has received an Industrial Wastewater Discharge Permit Number 15500 from the County of Los Angeles Sanitation Districts for the discharge of washdown water to an industrial wastewater clarifier and the sewer system.

- **Permit to Operate** - Issued by the South Coast Air Quality Control Management District (AQMD) - Currently, and as proposed, there are no on-site conditions at ELARTS which require an AQMD Permit to Operate.

- **Hazardous Waste Generator Identification Number** - The facility has received a State Site Specific Identification number EPA ID No. CAL000172270 from the Department of Toxic Substances Control (DTSC). This number is used for all manifesting, record keeping, and reporting required for household hazardous waste discovered through the load checking program and is unaffected by an increase in the permitted daily capacity.

- **Solid Waste Facilities Permit** – Issued by the CIWMB under the guidance of the LEA - The facility is permitted by Solid Waste Facility Permit No. 19-AA-0845 to receive the current 700 tons of municipal solid waste per. Once the local permitting is complete for the increase to 1,500 TPD an application for a revised SWFP will be submitted to the State of California CalRecycle.

- **Alternative Odor Management Plan (AOMP)** – Prepared in accordance with AQMD Rule 410 and approved by the AQMD and the LEA in 2008. An update to the AOMP discussing the Level 2 Control Strategies will be submitted at least 180 days prior to increasing the permitted throughput to 1,500 TPD.

SECTION 3: OPERATIONS PLAN

3.1 DETAILED SITE PLAN

3.1.1 Site Access

Collection trucks transporting MSW enter through the main driveway on Whiteside Street and generally access the tipping floor using the southern-most doors. Vehicles transporting primarily recovered recyclable materials from ELARTS typically access the tipping floor using the northern-most door. Transfer trucks enter from Knowles Avenue at a separate gate. Visitors enter the facility from Whiteside Street and park in the designated area adjacent to the office.

3.1.2 Main Tipping/Waste Transfer Area

Collection vehicles enter the facility and weigh-in on the 70 ft electronic scale. All vehicles entering the site are screened for radioactive materials as they weigh in at the scales. A gamma-scintillation counter has been installed at the scale house to detect low levels of radioactive wastes that may be present in the incoming loads. An alarm is sounded when excessive radiation emissions are detected. Loads suspected of containing radioactive materials are pulled aside and scanned again to ensure a proper reading. If the alarm sounds again, the suspect vehicle is taken to an isolated area and both the LEA and the Los Angeles County Department of Occupational Health and Radiation Management are called to inspect the load. Jointly, they will determine the final disposition of the radioactive load.

If the truck is carrying mixed municipal solid waste from residential or commercial generators, with low recyclable content, the scalehouse operator directs it to tip near the load-out ports. Spotters guide the trucks to the proper unloading area. After tipping, trucks exit the facility[3].

In order to maximize safety on the tipping floor, self-haul vehicles are kept separate from the larger commercial collection vehicles. In general, commercial collection vehicles use the southern portion, while self-haul vehicles use the northern portion of the tipping floor. Traffic directors (or spotters) within the building guide the self-haul and commercial trucks to the proper unloading area, ensuring the vehicles maneuver safely.

After the collection vehicles have unloaded, floor sorters salvage recyclables and bulky items from the floor and load them into roll-off boxes stationed on the tipping floor. The remaining materials are pushed by loader through the transfer load-out ports into transfer trailers

[3] Most truck tare weights are coded into the scalehouse computer system so that repeat customers do not have to weigh-out when they exit.

or shipping containers stationed on axle scales in the below-grade transfer tunnel. An electronic scoreboard suspended above the loading port informs the loader operators when a trailer or container has reached its legal weight limit. A dispatcher then radios the transfer trailer driver to exit the tunnel. Upon exiting the tunnel, the driver pauses at the exit, covers the load to prevent litter, and exits the site.

Storage of waste is adjacent to the transfer load-out ports. Waste is transferred on a "first-in, first-out" basis whenever possible. Odorous loads are transferred immediately. In accordance with State law, no waste is stored at the facility for more than 48 hours.

After the materials are processed at the ELARTS facility and the recyclable materials are removed, the remaining waste residue is transported, via transfer truck and trailer to one (or more) of the following permitted disposal facilities:

- Sunshine Canyon Landfill
- Olinda Alpha Landfill
- Puente Hills Landfill

Under certain conditions (e.g., emergencies, landfill closures, etc.), ELARTS may utilize other permitted disposal facilities.

3.1.3 Self-Haul Area

Self-haul loads are delivered by two primary types of customers: professional landscapers and gardeners (repeat customers), and from residents (non-repeat customers). Repeat customers scale-in and are charged on a $/ton basis similar to other collection vehicles. For non-repeat customers, a flat tipping fee may be used in lieu of a per ton fee so these vehicles may not be required to scale-in or scale-out. The flat fee may be adjusted periodically.

In order to maximize safety on the tipping floor, self-haul vehicles are kept separate from the larger commercial collection vehicles. In general, self-haul vehicles use the northern portion of the tipping floor, while commercial collection vehicles use the southern portion. Traffic directors (or spotters) within the building guide the self-haul vehicles to the proper unloading area, ensuring the vehicles maneuver safely.

3.1.4 Materials Recovery

Diversion at the facility consists of floor sorting using a combination of manual and mechanical labor. Recyclable Material Collection vehicles enter the facility and weigh-in on the 70 ft electronic scales. After weighing-in, the scalehouse operator directs the vehicle to unload at a designated tipping area. Spotters guide the trucks to the proper unloading area. After tipping, trucks will exit the facility. After unloading the collection vehicles, floor sorters and mechanical equipment (fork-lifts, loaders) salvage bulky items from the floor and load them into roll-off boxes stationed on the tipping floor.

3.1.5 Waste Storage Areas

Residue awaiting transfer is temporarily staged near the load-out port. Waste storage is minimized by implementing a "first-in, first-out" policy. In accordance with 14 CCR 17513, no municipal solid waste is stored onsite longer than 48 hours. However, ELARTS does not anticipate waste storage for this extended amount of time. Waste is typically transferred from the building within 24 hours. Odorous loads are transferred immediately.

3.1.6 Recyclable Materials Storage Area

The following materials may be recovered and temporarily stored at the facility: all grades of paper, plastics, scrap metals, and textiles. Recyclables recovered from the tipping floor are temporarily stored along the northern-edge of the tipping floor (along the push walls) and/or in bins/roll-off containers (from 3 to 40 cubic yards). Storage of recovered materials is typically within the enclosed building. Under some circumstances, bins containing recyclables may be temporarily stored outside along the north wall.

Small amounts (anticipated to be less than 5 percent of incoming materials) of green waste may be received and/or recovered on the tipping floor. In general, the clean green waste is stored in piles along the push walls located along either the north and east side of the tipping floor. The clean green waste is transferred into transfer trucks via front loader or, if there is not enough material to fill a transfer trailer, it is placed into roll-off containers. In either event, the clean green waste is transported to a green waste processor (e.g., compost facility or mulching process).

In order to minimize issues associated with processing and handling of clean green waste, the green waste is processed and transferred off-site within 48 hours (usually within 24 hours) of receipt. Facility personnel monitor the green waste to ensure that it doesn't cause odor, or other related problems. If the green waste becomes odorous, the green waste is sprayed with an odor neutralizing agent (such as Eco-Sorb, or similar) and transferred immediately to a green waste processor.

3.1.7 Parking Areas

Onsite parking is provided for all employees and visitors. There are 20 existing and 4 additional proposed onsite parking spaces. If it is necessary to hold any loaded trailers overnight, they are parked on-site at ELARTS within the enclosed building.

3.1.8 Traffic Flow Plan

A traffic management plan has been developed and implemented for the facility to ensure safe and efficient traffic operations. During waste receiving hours, facility personnel stationed in the scalehouse monitor all incoming traffic. During non-waste receiving hours, the facility is secured by fences, walls, and gates at all entry and exit points. In order to minimize conflicts with the various vehicles, traffic directors (or spotters) within the building guide the self-haul, recyclable material vehicles, and commercial collection vehicles to the proper unloading area, ensuring the trucks maneuver and back-up safely.

3.1.9 Waste Flow

A discussion of the material handling activities is presented in Section 3.4, titled *Material Handling Activities*.

3.1.10 Surface Drainage and Runoff Control

A NOI for an NPDES General Storm Water Permit is on file with the Regional Water Quality Control Board, Los Angeles Region. In addition, a SWPPP and MPP has been prepared and implemented to manage storm water at the facility.

3.1.11 Industrial Wastewater Discharge

An Industrial Wastewater Discharge Permit has been obtained from County Sanitation Districts of Los Angeles County. A minimal amount of industrial wastewater is generated by the occasional cleaning of the inside of the building and equipment. All industrial wastewater is routed through an on-site industrial clarifier prior to discharge into the sewer system. The clarifier is sufficiently sized to accommodate any additional industrial wastewater that may be generated as a result of the proposed increase in permitted maximum daily capacity.

3.1.12 Utilities

Power to the facility is provided by the Southern California Edison. Water is supplied by the California Water Service Company and sewer service is supplied by the County of Los Angeles Sanitation District.

3.2 STATION IMPROVEMENTS

3.2.1 Signage

Signs stating the name of the facility and facility operator are posted at all entrances. In addition, signs conforming to the Conditional Use Permit requirements, as well as County of Los Angeles planning standards are maintained and replaced as needed to ensure easy readability and maintain aesthetics. All signs are in English and Spanish. The following signs are posted:

- Signs Located at the Entrance of the Facility

  Information Includes: Hours of Operation; Days of Week; Name of Facility and Operator; Materials Accepted/Not Accepted; Rates and Fee Schedule; Speed Limit; and Name/Telephone numbers for the Transfer Station Manager, the LEA, and the AQMD for "Questions and Complaints".

- Signs Located at the Scale House

  Information Includes: Rates and Fee Schedule; Transfer Station Rules (stay in truck, etc.); and the Facility's Tarping Requirement.

- Signs Located on Each Public Street Frontage

  Information Includes: Name/Telephone Number of Facility Operator; Name/Telephone Number of Local Enforcement Agency; and Name/Telephone Number of Regional Planning Zoning Enforcement Section.

3.2.2 Security

The site is secured to prevent illegal entry. During waste receiving hours, facility personnel stationed in the scalehouse monitor all incoming traffic. During non-waste receiving hours, the facility is secured by a combination of walls and fencing, as well as gates at all entry and exit points.

3.2.3 Roads

All on-site roads are paved. The tipping areas inside the building are concrete and designed for heavy use. Daily sweeping to remove litter and provide dust control does not impact the structural integrity of the site surfaces. The site is accessible during dry and wet weather periods.

3.2.4 Visual Screening

The facility was designed and constructed so that a portion of the transfer building and its operations are screened by a fence around the perimeter of the site. Landscaping consists of hedges, shrubs, and trees and is maintained in compliance with all Los Angeles County ordinances.

3.3 FACILITY OPERATIONS

3.3.1 Hours of Operation

Table 4 presents the permitted hours of operation for the facility. The posted operating hours at the facility are from 6:00 a.m. to 6:00 p.m., Monday through Friday and from 6:00 a.m. through 2:00 p.m. on Saturdays.

TABLE 4
Operating Hours

Activity	Operating Hours
Municipal and Commercial Waste Receiving	6:00 a.m. - 9:00 p.m., Monday - Saturday
Public Tipping (Residents, non-commercial users)	6:00 a.m. - 9:00 p.m., Monday - Saturday
Waste Processing	24 hours a day, Monday - Saturday
Waste Transfer	6:00 a.m. - 9:00 p.m., Monday - Saturday

3.3.2 Station Personnel

Facility management is selected based on their proven experience in the waste management industry. Table 5 presents the facility positions and number of personnel anticipated at the facility when processing 1,500 TPD. The number and assignments may change depending on actual operational requirements. At a minimum, ELARTS has a supervisor on-duty during all operating hours. Attendants are posted at the scalehouse and the tipping area to ensure safe public use.

TABLE 5
Facility Staffing Levels

Position	No. of Employees
Facility Management	1
Supervisor/Scale Operator/Health and Safety	2
Equipment Operators	4
Raker/Spotter/Floor Sorters/Traffic Director	3
TOTAL	**10**

3.3.3 Employee Training

All employees receive training including, but not limited to: safety, health, environmental controls, and emergency procedures. The training programs offer standardized training for all employees in company operations, policies and procedures, plus additional job-specific training based on the various job descriptions and responsibilities of the employees. For example, floor sorters are trained to recognize the types of hazardous or special waste that may be inadvertently included in the loads brought to the facility. Employees receive regular safety briefings. Copies of training records are kept on file at the facility's on-site administrative offices and are available for inspection from 9 a.m. - 4 p.m. Monday through Friday.

3.3.4 Emergency and Government Agency Contacts

Table 6 presents the Emergency Contact List for the ELARTS Facility. Table 7 presents the Government Contact list.

TABLE 6

East Los Angeles Recycling and Transfer Station

Emergency Contact List

In the case of an emergency, the following persons should be contacted:
Owner/Operator
Consolidated Disposal Service L.L.C. Russell Dix, President 12949 Telegraph Road Santa Fe Springs, CA 90670 (562) 663-3455 (on-duty)

TABLE 7

East Los Angeles Recycling and Transfer Station

Government Contacts

Regulatory Agency	Description
County of Los Angeles Department of Regional Planning 320 W. Temple Street Los Angeles, California 90012 (213) 974-6411	The Regional Planning Commission is responsible for issuing and enforcing the terms of Conditional Use Permit Nos. 95-240-(1) and 00-145-(1).
Los Angeles County Solid Waste Management Committee/Integrated Solid Waste Management Task Force Department of Public Works 900 S. Fremont Avenue Alhambra, California 91802 (626) 458-3546	For all new Material Recovery Facilities, which recover more than 15 percent of inflow, which have not previously been identified in a County Solid Waste Management Plan, a site identification and facility description must be submitted to the Solid Waste Management Committee/Integrated Solid Waste Management Task Force for review and comment.
County of Los Angeles, Department of Public Health Solid Waste Management Program 5050 Commerce Drive Baldwin Park, California 91706 (626) 430-5540	The County Department of Public Health has been designated as the Local Enforcement Agency (LEA) for permitting and enforcement programs for solid waste facilities in unincorporated Los Angeles County. The Department has the responsibility of enforcing the conditions of Solid Waste Facility Permits (SWFPs), enforcing the State Minimum Standards for Solid Waste Handling and Disposal, revising SWFPs, and ultimately issuing the final SWFP.
Duty Officer Los Angeles County Fire Department Health Hazardous Materials Division 5825 Rickenbacker Rd Commerce, California 90040 (323) 890-4045	The Los Angeles County Fire Department Health Hazardous Materials Division is responsible for receiving and responding to calls (emergency and routine) involving hazardous materials.
Environmental Crimes Division/OSHA Los Angeles County District Attorney (213) 580-8777	The Los Angeles County District Attorney Environmental Crimes Division is responsible for investigating crimes against the environment.
California Integrated Waste Management Board 1001 "I" Street Sacramento, California 95812 (916) 341-6000	The California Integrated Waste Management Board (CIWMB) is responsible for concurring with the LEA in issuing a SWFP for all proposed solid waste management facilities within the state.

County of Los Angeles Department of Public Works Waste Management Division 900 South Fremont Avenue Alhambra, California 91002 (626) 458-5100	The County of Los Angeles Department of Public Works, Waste Management Division is responsible for issuing an Industrial Waste Discharge permit for discharge to the County sanitary sewer system.
South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, California 91765 (800) 288-7664	The South Coast Air Quality Management District is responsible for approving the Alternative Odor Management Plan and for investigating odor and/or dust complaints.
California Highway Patrol (800) 835-5247	The California Highway Patrol is responsible for investigating all illegal or accidental hazardous material releases.

3.3.5 Station Equipment

Table 8 presents the type of equipment and estimated number of equipment units anticipated when the facility receives 1,500 TPD.

- Transfer Trucks: Assuming an average load of 22 to 23 tons per truck and 1,500 tons of proposed waste transferred per day, there will be a total of approximately 68 round trips to the landfill per day. It is estimated that one transfer truck can make 4 round trips to the landfill each day. Therefore, ELARTS will utilize approximately 17 transfer trucks and trailers. Additional transfer trucks and/or trailers may be added if needed.

- Loaders: one loader is anticipated at the commencement of operations. Additional loaders may be added if needed.

TABLE 8
Current Station Owned Equipment

Equipment Type	No. Equipment Units @ 700 TPD
Transfer Trucks with Trailers	8
Loaders	1
Forklifts	As needed
Sweeper/Scrubber	1
Electronic Truck Scales (70')	1

3.3.6 Preventative Maintenance Program

An equipment preventative maintenance program has been implemented at the facility to ensure the reliability of all equipment and vehicles. The schedule is approximately as follows:

- Loaders and Forklifts: Every 250 hours of operation
- Trailers: Weekly brake examination and adjustment; welding as needed.

ELARTS performs equipment maintenance onsite or off-site, depending on the level of service required and available area to perform the required maintenance. Some maintenance is performed by trained on-site personnel and some maintenance is performed by a contracted service provider.

Transfer trucks are owned by Specialty Transportation Systems ("STS") and contracted for use by Consolidated at ELARTS. They are maintained and stored (when not in use) off-site. One of their storage yards is located at 12235 Los Nietos Street in Santa Fe Springs, California. Maintenance of these vehicles includes brake inspections, adjustments, and minor welding. Transfer trailers are open-topped and covered with a plastic mesh hinged cover welded to the trailer body. This allows drivers to easily place and remove the cover as needed. The trailers have walking floor systems, such as the Keith Compact Drive Walking Floor, for ease of unloading. These systems are rubber-lined and demonstrated to be leak resistant.

3.3.7 Standby Equipment

To assure ongoing operations, the following back-up equipment will be maintained at ELARTS, Consolidated's Vehicle and Maintenance Facility located at 2531 East 67th Street in Long Beach, California, and/or from off-site sources on an on-call basis:

- One (1) loader
- One (1) portable generator (may be kept on-site for emergency purposes)
- One (1) transfer trailer for every seven transfer trailers in use (STS maintains backup trucks and trailers).

To assure fast repair, adequate parts and supplies may be kept on-site at ELARTS and/or maintenance contracts may be established with equipment vendors. For the quick replacement of mobile equipment, nearby equipment rental companies in the Los Angeles area can provide same day delivery of loaders and forklifts.

3.4 MATERIALS HANDLING ACTIVITIES

The following section describes the general areas used for waste handling activities. Occasionally, these areas may be used to handle other types of permitted wastes than those described herein.

3.4.1 Main Tipping Area/Waste Transfer

Collection vehicles enter the facility and weigh-in on the 70 ft electronic scale. All vehicles entering the site are screened for radioactive materials as they weigh in at the scales. A gamma-scintillation counter has been installed at the scale house to detect low levels of radioactive wastes that may be present in the incoming loads. An alarm is sounded when excessive radiation emissions are detected. Loads suspected of containing radioactive materials are pulled aside and scanned again to ensure a proper reading. If the alarm sounds again, the suspect vehicle is taken to an isolated area and both the LEA and the Los Angeles County Department of Occupational Health and Radiation Management are called to inspect the load. Jointly, they will determine the final disposition of the radioactive load.

If the truck is carrying MSW from residential or commercial generators, with low recyclable content, the scalehouse operator direct it to tip near the load-out ports. Spotters guide the trucks to the proper unloading area. After tipping, trucks exit the facility.[4]

In order to maximize safety on the tipping floor, self-haul vehicles are kept separate from the larger commercial collection vehicles. In general commercial collection vehicles use the southern portion, while self-haul vehicles use the northern portion of the tipping floor. Traffic directors (or spotters) within the building guide the self-haul and commercial trucks to the proper unloading area, ensuring the vehicles maneuver safely.

After unloading, floor sorters may salvage recyclables and bulky items from the floor and load them into roll-off boxes stationed on the tipping floor. Waste material is pushed by loader through the transfer load-out ports into transfer trailers or shipping containers stationed on axle scales in the below-grade transfer tunnel. An electronic scoreboard suspended above the loading port informs the loader operators when a trailer or container has reached its legal weight limit. A dispatcher then radios the transfer trailer driver to exit the tunnel. Upon exiting the tunnel, the driver pauses at the exit, covers the load to prevent litter, and exits the site.

Storage of waste is adjacent to the transfer load-out ports. Waste is transferred on a "first-in, first-out" basis whenever possible. Odorous loads are transferred immediately. In accordance with State law, no waste is stored at the facility for more than 48 hours.

[4] Most truck tare weights are coded into the scalehouse computer system so that repeat customers do not have to weigh-out when they exit.

After the materials are processed at ELARTS and the recyclable materials are removed, the remaining waste residue is transported, via transfer truck and trailer to one (~~or more~~) of the following permitted disposal facilities:

- Sunshine Canyon Landfill
- Olinda Alpha Landfill
- Puente Hills Landfill

Under certain conditions (e.g., emergencies, landfill closures, etc.), ELARTS may utilize other permitted disposal facilities.

3.4.2 Self-Haul Area

Self-haul loads are delivered by two primary types of customers: professional landscapers and gardeners (repeat customers), and from residents (non-repeat customers). Repeat customers scale-in and are charged on a $/ton basis similar to other collection vehicles. For non-repeat customers, a flat tipping fee may be used in lieu of a per ton fee so these vehicles may not be required to scale-in or scale-out. The flat fee may be adjusted periodically.

After unloading, recyclable materials such as wood, scrap metals, and inerts are sorted from the debris using a loader and floor sorters. Recovered materials are placed in roll-off boxes stationed along the perimeter of the tipping area.

In order to maximize safety on the tipping floor, self-haul vehicles are kept separate from the larger commercial collection vehicles. In general, self-haul vehicles use the northern portion of the tipping floor, while commercial collection vehicles use the southern portion. Traffic directors (or spotters) within the building guide the self-haul vehicles to the proper unloading area, ensuring the vehicles maneuver safely.

3.4.3 Scavenging, Salvaging and Materials Recovery

Pursuant to Section 17409.3 (a) of Title 14, scavenging at ELARTS is strictly prohibited. Diversion at the facility, which includes salvaging, consists of floor sorting using a combination of manual and mechanical labor. Collection vehicles enter the facility and weigh-in on the 70 ft electronic scales. After weighing-in, the scalehouse operator and spotters guide the trucks to the proper unloading area. Loads containing a high percentage of recyclable materials and/or originating from specific jurisdictions are unloaded at a designated tipping area, typically the north portion of the tipping floor. After tipping, trucks will exit the facility. After unloading the collection vehicles, floor sorters and mechanical equipment (fork-lifts, loaders) salvage bulky items from the floor and load them into roll-off boxes stationed along the edge of the tipping floor.

3.4.4 Hazardous Waste Loadchecking Program

No designated, special, untreated medical, liquid or hazardous wastes are accepted at ELARTS. However, it is not unusual for such items to occasionally show up at solid waste facilities. As a result, and in accordance with Title 22 of the California Code of Regulations, a Hazardous Waste Load Check Program has been implemented to enforce this policy. To ensure that radioactive materials are not accepted at ELARTS, a radiation detection device is present at the scalehouse.

Collection vehicles enter the facility and weigh-in on the 70 ft electronic scale. All vehicles entering the site are screened for radioactive materials as they weigh in at the scales. A gamma-scintillation counter has been installed at the scale house to detect low levels of radioactive wastes that may be present in the incoming loads. An alarm is sounded when excessive radiation emissions are detected. Loads suspected of containing radioactive materials are pulled aside and scanned again to ensure a proper reading. If the alarm sounds again, the suspect vehicle is taken to an isolated area and both the LEA and the Los Angeles County Department of Occupational Health and Radiation Management are called to inspect the load. They will jointly determine the final disposition of the radioactive load.

If untreated medical waste is inadvertently received at ELARTS, the State Department of Health Services (Environmental Management Branch, Medical Waste Management Program) will be contacted to inspect and determine the final disposition of the items. Should body parts or suspected body parts be identified, the Los Angeles County Coroner will be contacted to inspect and determine the final disposition of the items.

All hazardous wastes are manifested and transported off-site to a permitted disposal facility in accordance with local, state, and federal laws.

3.4.5 Hazardous Waste Storage

Hazardous wastes discovered as part of the hazardous waste loadchecking program are properly containerized and stored in an EPA-approved, lockable hazardous waste storage locker located in the northwest portion of the building. The locker is stationed away from on-site traffic patterns. At a minimum, the hazardous waste storage area is inspected weekly. The hazardous waste storage has a storage capacity of five (5) 55-gallon drums. All Federal, state and local hazardous waste laws and regulations are complied with.

3.5 STATION MAINTENANCE

A comprehensive station maintenance program has been implemented at the facility. The program features a Self Inspection Checklist which is completed on a regular basis. The Checklist entails the monitoring of the General Work Environment, Worker Right-To-Know, Hazardous Waste Procedures, Personal Protective Equipment, Facility Equipment, and Facility Structure Evaluation. Elements of the Self Inspection Checklist are monitored on a daily, weekly, or monthly basis. Items found to be in need of maintenance will be brought to the attention of the Operations Manager.

The site is cleaned daily to collect loose litter and dust. A street sweeper patrols the site on a routine basis cleaning the site, including driveways, parking areas, and truck maneuvering areas. At least once per day, the tipping floor and truck load-out areas are cleaned. Every 4-8 weeks, or as needed, the tipping and processing areas are cleaned using a high-pressure water spray which generates little to no wastewater.

Equipment and containers are cleaned on weekly basis, at an off-site location (typically at Consolidated's Vehicle and Maintenance Facility located at 2531 East 67th Street in Long Beach, California), using a high-pressure water spray.

3.6 HEALTH AND SAFETY PROGRAM

3.6.1 Employee Health and Safety

An extensive health and safety program has been implemented at the facility to ensure the health and safety of all employees and the public visiting the facility. It includes the following programs:

- Emergency Response/Contingency Plan
- Employee Safety Training Program
- Illness and Injury Prevention Program (IIPP)
- Hazard Communication Program

3.6.2 Water Supply and Sanitary Facilities

The potable water supply is provided by California Water Services Company. Water fountains or other potable water dispensers are located in the administrative offices and in the transfer station building for visitors and employees. Restrooms are available in the breakroom.

3.6.3 Communications

The facility has a communications network between the scalehouse, tipping floor, transfer trucks, loaders, and administrative offices to ensure the smooth operation of the facility. The scalehouse and administrative offices are equipped with intercom phone systems, outside phone lines, and paging systems. Floor spotters, supervisors, loader operators, dispatch, and transfer trucks are equipped with two-way radios. The administrative offices have outside phone lines and a facsimile machine.

3.6.4 Lighting

The facility was constructed with indoor and outdoor lighting sufficient to conduct operations during non-daylight hours. Outdoor lighting consists of a combination of pole- and building-mounted, cut-off type fixtures sufficient to light outdoor areas of the site. This lighting is directed to the interior of the site and shielded to reduce glare. Indoor lighting varies, but generally consists of high bay lights to illuminate the tipping and processing areas.

3.6.5 Fire Prevention

A fire prevention system was designed and installed at the facility in conformance with all Los Angeles County fire codes. This includes an automated, overhead sprinkler system throughout the building and offices. Fire extinguishers are located in accordance with the requirements of the Los Angeles County Fire Marshal.

3.6.6 Safety Equipment

The facility requires that employees directly involved in waste handling operations be properly outfitted with Personal Protective Equipment (PPE). At a minimum, these employees are required to wear hard hats, safety glasses or goggles, safety vests, gloves, and safety boots. In addition, ear protection is provided for all employees. Employees involved in hazardous waste handling are required to wear specialized safety equipment. This equipment is described in the section, Hazardous Waste Handling Equipment. First aid kits and eye wash kits will be located throughout the facility.

The facility has operational controls and safety devices for equipment to protect employees. An emergency drench shower/eye wash is located on the south wall within the transfer station building, as indicated on the site plan. In addition, railings, curbs, grates, fences and other controls have been designed to meet State and Federal Occupational Safety and Health Administration (OSHA) standards in order to ensure the safety of each employee.

The Facility Manager and supervisors are responsible for the following: 1) monitoring and evaluating safety equipment at the facility to ensure that it is in good condition and adequate stock; 2) inspecting the PPE on a daily basis while touring the facility; 3) issuing new PPE as needed, or at the request of employees; 4) inspecting hazardous waste response equipment (e.g., spill response) on a monthly basis, any items will be replaced as needed; and 5) checking fire extinguishers, first aid kits, and eye wash kits monthly.

3.6.7 Emergency Provisions for Power Failure

If electrical power to the site is temporarily lost, a mobile generator will be put into service to provide lighting, communications, and operating power for waste transfer functions at the facility. The generator will be equipped with its own fuel supply. This back-up power allows the facility to continue operating. If power is lost for an extended period of time, collection trucks may be instructed to bypass the facility and deliver their loads directly to the nearest available landfill.

3.7 STATION CONTROLS

3.7.1 Nuisance Controls

Strict operating practices, such as daily cleaning, prompt removal of waste material, use of a misting system and maintaining perimeter fencing have been implemented to ensure that the facility does not poses a nuisance to the surrounding community.

3.7.2 Dust Controls

Fugitive dusts may be generated at the facility as a result of dumping, sorting, and processing of wastes, as well as vehicles used to transport materials on and off site. Dust is controlled at the facility through a variety of mechanical, operational, and housekeeping methods.

The primary source of dust control at the facility is to restrict waste dumping, sorting, and processing to the inside of the transfer station building. Dust control features of the building include a misting system above the load-out ports and a continuous ridge vent along the top of the building.

To reduce worker exposure to dust inside other parts of the building, employees working in the tipping areas are encouraged to use dust masks. At least once per day, the tipping floors and load-out areas are cleaned to remove dust and litter. Every four to eight weeks, or as needed, a high pressure water spray is used to clean dust from the tipping and waste processing areas.

To control fugitive dust outside the building, onsite vehicle speed is limited to 5 mph, and a street sweeper routinely patrols the site.

3.7.3 Vector and Bird Control

A vector control program for the facility consists of the following elements:

- Typically, non-salvageable waste will be transferred to trailers for hauling to a landfill shortly after the waste is received in the tipping area.
- Waste will not be stored on site for longer than 48 hours.
- Salvageable loads tipped in the sorting areas are processed within 48 hours of receipt at the facility.
- Recyclables are transported off-site continuously.

- A pest control company visits the site once per month to inspect the facility, and to set and inspect rodent traps.

- Equipment is cleaned and maintained on a regular basis. Each piece of equipment is cleaned on a weekly basis.

Since all waste unloading and processing occurs indoors, birds are not expected to pose a nuisance. However, if birds become a nuisance, an aggressive bird control program may be implemented, and may include contracting with a bird control company and/or installing devices throughout the facility to discourage the birds from landing on or near the facility.

Regular maintenance and cleaning of the facility and equipment also controls vectors. The Operations section, discusses maintenance and cleaning schedules.

3.7.4 Drainage Controls

The site utilizes structural and non-structural drainage controls to prevent the discharge of polluted wastewater or storm water into the sewer or storm drain.

The primary source of wastewater generated at the facility is from equipment washdown. Equipment washed includes recycling equipment, such as bins and containers, and mobile equipment, such as loaders and forklifts. Small quantities of wastewater from inside the transfer tunnel are also anticipated. Minimal wastewater is generated from periodic water-spraying of stationary equipment and building interior walls. The small quantity of water either evaporates or is removed by the facility's sweeper. Wastewater from the washdown area and transfer tunnel is routed to an industrial wastewater clarifier prior to discharge to the sewer.

Facility wastewater is expected to contain some dirt and small suspended inert debris. A very small concentration of organic matter and oil might also be found in the washdown water. Discharges to the sanitary sewer are permitted under an Industrial Wastewater Discharge Permit issued by the Los Angeles County Department of Public Works.

Storm water discharges are regulated under a General Industrial Storm Water Permit issued by the California Regional Water Quality Control Board. The facility has a NOI on file. A SWPPP and MPP have been developed in compliance with this program.

3.7.5 Litter Controls

The facility is patrolled and cleaned daily to remove waste debris, and to control dust and litter. Litter control measures include mechanical sweeping of the facility on a regular basis, manual sweeping around fixed equipment, and a litter abatement program for all property boundaries and adjacent roadways. Litter is also controlled by fences and walls positioned

around the perimeter of the site. To prevent litter from falling out of refuse collection and long-haul transfer vehicles, the facility has instituted a mandatory tarping policy. This policy requires all incoming loads be covered. Measures for enforcement include warnings, refusal of loads, and possibly being banned from the facility.

3.7.6 Noise Controls

To mitigate any potential noise impacts, waste unloading and processing operations are confined to the interior of the building, and onsite mobile equipment is properly sound-proofed and/or muffled.

Employees working inside the building are given ear protection as necessary. In addition, a Hearing Conservation Program has been implemented at the facility to periodically measure interior and exterior noise levels at the facility.

3.7.7 Odor Controls

Potential odors are controlled using the measures outlined in the ELARTS Odor Control Mitigation Program which includes the AOMP. The misting system was designed and constructed to assist in the control of odors at a facility receiving greater than 700TPD.

3.7.8 Traffic Controls

ELARTS follows the recommendations from the County of Los Angeles Regional Planning Department regarding traffic routing to minimize the impact on local streets. No queuing of vehicles on public streets occurs at the facility. An onsite traffic management plan has been developed to ensure safe traffic operations.

The site is secured to prevent the illegal entry of vehicles into the facility. During waste receiving hours, facility personnel stationed in the scalehouse monitor all incoming traffic. During non-waste receiving hours, the facility is secured by a combination of walls, chain link fencing and gates at all entry and exit points.

3.7.9 Station Records and Reporting Procedures

Station Records

Records which quantify, by month, the total tonnage received, total tonnage sent to individual disposal facilities, total tonnage diverted, and total number of vehicles utilizing the site, are maintained at the facility's on-site administrative offices. Summary reports can be made available to the LEA as requested, and will be available for inspection at the facility offices upon request.

Records are also kept at the facility which demonstrate implementation of the various facility programs, including:

- Employee Training (new employee orientation, periodic update training, hazardous waste handling training);
- Facility Self Inspection Program (including site safety evaluations, general work environment, facility structure evaluation, hazard communication, hazardous waste operations and inspections, and facility maintenance);
- Health and Safety Programs (including employee orientation and refresher training);
- Storm Water Pollution Prevention Plan;
- Alternative Odor Management Plan;
- Hazardous Waste Loadchecking Program; and
- Vector Control Program.

Special Occurrences

A Special Occurrences Log is kept on a daily basis to document any loads refused entry to the facility, fires, vectors, injuries, accidents, flooding, property damage, inspections, and notices of violations. The Operations Manger is responsible for making sure the log is completed each day. The log is kept in the on-site administrative offices.

Inspection of Records

To the extent practical, facility records are maintained in ELARTS administrative offices located at the facility, and are available for inspection by contacting the facility operator between the hours of 9:00 a.m. and 4:00 p.m. Monday through Friday. In some cases, records may be on file at Consolidated's corporate offices located at 12949 Telegraph Road in Santa Fe Springs, California.

Monitoring and Reporting Schedule

Table 9 presents the monitoring and reporting schedule for various facility programs.

TABLE 9
Monitoring And Reporting Schedule

Program	Monitoring	Reporting
Training Program		
General Safety	Annually	Upon request
First Aid	Annually	Upon request
Safety Equipment	Annually	Upon request
Emergency Procedures	Annually	Upon request
Storm Water Pollution Prevention	Annually	Upon request
Hazardous Waste Handling	Annually	Upon request
Self Inspection Program		
General Environment	Weekly	Upon request
PPE	Daily	Upon request
Facility Equipment	Monthly	Upon request
Hazardous Waste	Monthly	Upon request
Facility Structure	Monthly	Upon request
Right-to-Know	Weekly	Upon request
Health and Safety Program		
Vector Control	Monthly	Upon request
Hazard Communication	Quarterly	Upon request
Lock-out, tag-out	Quarterly	Upon request
Hearing Conservation	Annually	Upon request
Respiratory Protection	Quarterly	Upon request
Miscellaneous		
Weight Records	Daily	Monthly
Special Occurrences	Daily	Upon request
Loadchecking	Daily	Upon request

EXHIBIT 8

ZONING PERMIT APPLICATION

This application must be submitted in person. For a submittal appointment, call 213-974-6438.

THIS SECTION - STAFF USE ONLY

Plan:	I	Code Section	Project No. R2012-00279
Zone:	M-2		Permit No. RCUP 201200025 RENV 201200039
CSD:	East LA CSD		
TOD:	/		
ESHA / SEA:	/		RFS No. 08-0027834 (Amended)

SA: N (E) W SD: 1 2 3 4 5 ZD: City Terrace GB? Y N LID? Y N DT? Y N

1. Subject Property (Sujeto Propiedad)

Assessor's Parcel Number(s)
APNs: 5224-009-025 and 5224-009-014

Property Size (Gross Area in Acres)
1.6 acres

Property Address or Site Location
1511-1533 Fishburn Avenue, Los Angeles, CA 90063

Name of Business or Establishment (If Applicable): City Terrace Recycling, LLC

2. Uses (Usos)

Current: Material Recovery Facility and Transfer Station Proposed: Same

☐ Continued (Renewal) Previous Permit Number: 200500048-(1) *Attach copy of Findings and Conditions if available.*

3. Project Description (Proyecto) *Describe project in detail. Attach additional page(s) if necessary. See Instructions/Checklist*

The site currently operates as a Material Recovery Facility (MRF) and Transfer Station. The facility is proposing to increase their daily maximum capacity of 700 tons per day (TPD) to 1,500 TPD. Due to this increase in tonnage, the facility is also proposing to retrofit an existing canopy to provide additional covered tipping and processing areas. The facility is also proposing to add an anaerobic digestion system onsite to process foodwaste/greenwaste.

See attached Project Description for more details.

Check/Complete All That Apply:

☐ No Improvements Proposed ☐ Demolition ☐ Private Septic System ☐ Private Well

New Building Construction (SF): Phase I: 6,420 sf; Phase II: 10,620 sf New Impervious Surfaces (Paving, Roofs, Etc. - SF): Entire site is paved

Grading (CY) Cut: 0 Fill: 0 Import: 0 Export: 0 ☐ Balanced on Site

Alcohol Sales: ☐ Beer & Wine or ☐ Full Line of Alcohol ☐ On-site Consumption or ☐ Off-site Consumption

4. Applicant (Solicitante)

Name: Robert Arsenian		Phone: (323) 780-7150
Address: P.O. Box 86786		Fax: (323) 780-7164
City/State: Los Angeles, CA	ZIP: 90086	Email: ryan@southlanddisposal.com

5. Agent (Agente) *If different from applicant*

Name: Ernest V. Clements		Phone: (818) 267-5100
Address: 15230 Burbank Blvd, Suite 103		Fax: (818) 782-6712
City/State: Sherman Oaks, CA	ZIP: 91411	Email: cclements@clementsenvironmental.com

6. Property Owner(s) (Dueño/a Registrado) *If different from applicant*

Name: Robert Arsenian		Phone: (323) 780-7150
Address: P.O. Box 86786		Fax: (323) 780-7164
City/State: Los Angeles, CA	ZIP: 90086	Email: ryan@southlanddisposal.com

7. Owner / Applicant Certification (Certificación del Solicitante, Agente o Dueño/a)

By my signature below, I hereby certify the following:

1. I understand that it is the responsibility of the applicant to substantiate the request through the Burden of Proof.
2. I understand there is no guarantee - expressed or implied - that any permit will be granted. I understand that each matter must be carefully evaluated and after the evaluation has been conducted or the public hearing has been held. Staff's recommendation or decision may change during the course of the review based on the information presented.
3. I understand that planning staff is not permitted to assist the applicant or opponents of the project in preparing arguments for or against a request.
4. I understand that the environmental review associated with the submittal of this application is preliminary, and that after further evaluation, additional information, reports, studies, applications and/or fees may be required.
5. I understand that if my application is denied, there is no refund of fees paid.
6. I understand that submitting inaccurate or incomplete information may result in delays or denial of my application.
7. I certify that the information provided in this application, including attachments, is accurate and correct to the best of my knowledge.
8. I have read and understand the foregoing, and agree to the submittal of this application.

Signature (Blue Ink): Robert M Arsenian Date: 2/10/2012

Print Name: Robert Arsenian Check One: ☒ Owner ☐ Applicant

8. Oak Tree Certification (Certificación de Árboles Robles) (Pursuant to Chapter 22.56, Pt. 16)

Check only one box below:

☒ By my signature below, I certify that there are no oak trees or oak tree protected zones (five feet from the drip line of the canopy or within 15 feet of any oak tree trunk, whichever distance is greater) located on the subject property or properties.

☐ By my signature below, I certify that there are oak trees or protected zones (five feet from the drip line of the canopy or within 15 feet. of any oak tree trunk, whichever distance is greater) within the subject property or properties, but that no work will be done within these protected areas. This applies to on and off-site oak trees. All oak tree dimensions, including trunk diameter and canopy, should accurately be depicted on the plans and be drawn to an acceptable scale.

☐ By my signature below, I certify that project activity will occur within the protected zone of an oak tree (five feet from the drip line of the canopy or within 15 feet of an oak tree trunk) and that I have concurrently submitted an Oak Tree Permit application. All oak tree dimensions, including trunk diameter and canopy are accurately depicted on the plans and drawn to an acceptable scale.

Signature (Blue Ink): [signature] Date: 2/13/12

Print Name: Ernest V. Clements Check One: ☐ Owner ☐ Applicant ☒ Agent

9. Lobbyist Statement (Información de un Grupo de Presión)

The Los Angeles County Lobbyist Ordinance, effective May 7, 1993, requires certification that each person who applies for a County permit is familiar with the requirements or Ordinance No. 93-0031 (Lobbyist Ordinance), and that all persons acting on behalf of the applicant have complied and will continue to comply with the requirements of said Ordinance through the application process. By my signature below, I hereby certify that I am familiar with the requirements of Ordinance No. 93-0031 and understand that making such a certification, and compliance with this ordinance, shall be conditions precedent to granting the permit requested, license, contract or franchise.

Signature (Blue Ink): [signature] Date: 2/13/12

Print Name: Ernest V. Clements Check One: ☐ Owner ☐ Applicant ☒ Agent

Lobbyist Permit Number, If Applicable:

The information requested is required for a Zoning Permit, Director's Review and Oak Tree Permit, pursuant to Sec. 22.56 of the Zoning Ordinance. Failure to provide complete and accurate information will cause delay. All required supplemental information must be submitted with this application. Additional application forms are available at: http://planning.lacounty.gov/apps. See instructions and checklist. For assistance, call 213-974-6411 or click http://planning.lacounty.gov/who.

THIS SECTION - STAFF USE ONLY – LDCC COMMENTS

Previous case: RCUP200500048 (R2005-00572)

City Terrace Recycling Material Recover Facility and Transfer Station

Project Narrative

(January 2012)

Located on approximately 1.6 acres within the unincorporated area of Los Angeles County known as City Terrace, the existing City Terrace Recycling Material Recovery Facility (MRF) and Transfer Station receives, processes, recycles, and transfers a variety of materials. The facility consists of two existing municipal solid waste (MSW) and recyclable material processing buildings, a construction and demolition (C&D) debris, inert material, greenwaste, and other material processing and recycling operation under a canopy, a maintenance shop, a scale, and an office.

Phase I of the proposed "project" consists of: retrofitting the existing canopy to provide a covered tipping and load-out area for C&D, inerts, greenwaste, and other material; adding a second scale; adding a second transfer truck load out station; and increasing the daily maximum capacity of 700 tons per day (TPD) to 1,500 TPD. Phase II additions will consist of a "mini" anaerobic digester facility and new 7,320 sf receiving and load out building. See **Attachment A** for an overview and an example of the anaerobic digestion system.

The daily quantity of material received will not exceed 1,500 tons. Inbound material will come from curbside collection programs, building and demolition contractors, roofers, and solid waste haulers. Non-salvageable residue will be trucked to permitted disposal sites. Solid residue from the digesters will be trucked to mulch and composting operations for recycling.

The facility will be open from 6:00 a.m. to 6:00 p.m. Monday through Saturday to receive and export material. The facility may process material and perform onsite maintenance 24 hours a day, seven days per week. The actual time of shifts will vary depending on type and amount of materials received (C&D, greenwaste, curbside recyclables, etc.). It is anticipated that the facility will have 18 employees.

Inside the facility, material is sorted by manual and mechanical methods to remove recyclables, which are baled and shipped to market. Non-salvageable residual is loaded into transfer trucks and hauled to local landfills for disposal.

Primary routes of delivery to the site are expected to be the I-10 and I-710 Freeways, Medford Street, Eastern Avenue, Herbert Avenue, and Fowler Street. Access to the facility is off Fishburn Avenue. See **Attachment B** for a Site Location map. The anticipated peak vehicles per day will be approximately 207. See the following table for the anticipated peak daily vehicles.

Anticipated Peak Daily Vehicles

VEHICLE TYPE	TOTAL (1,500 TPD)*
Inbound Vehicles	
Collection Trucks	125
Outbound Vehicles	
Transfer Trucks	44
Material Marketing Trucks	19
Employees	18
Visitors	1
TOTAL VEHICLES PER DAY	**207**

*Collection trucks: 12 tons per load; Transfer trucks: 24 tons per load; Material Marketing Trucks: 24 tons per load

The project location is optimal for this type of facility because:

- The site is zoned for industrial uses (M-2 Heavy Manufacturing). The surrounding properties are zoned as follows:
  - North: M-2
  - South: M-1 (Light Manufacturing), M-2, R-2 (Two-Family Residence)
  - East: M-1, M-2, R-2
  - West: M-2, Multi-family Residential
- The site is currently surrounded by a City automobile impound yard, a furniture refinishing company, the Nu Way Recycling Center, an industrial warehouse, and a few non-conforming two-family dwellings.
- All of the processing operations will occur within buildings enclosed on three sides.
- The site is easily accessed via the major roads which include State Route 1-10, I-710, Medford Street, Eastern Ave, and Fowler Street.
- The facility operates under tight regulatory control by the following agencies:
  - Los Angeles County Health Care Agency

- Los Angeles County Fire Authority
- South Coast Air Quality Management District
- Regional Water Quality Control Board
- County of Los Angeles Planning Department.
- California Department of Toxic Substance Control
- CalRecycle

ATTACHMENT A

ANAEROBIC DIGESTER
AND
CNG CONVERSION SYSTEM

Anaerobic Digestion Overview

In anaerobic digestion, the biodegradable, organic components of the waste stream are metabolized by microorganisms in the absence of oxygen, producing a biogas (primarily methane and carbon dioxide), and a solid byproduct (called "digestate", which is generally considered to be a feedstock compost). The anaerobic digesters achieve significant diversion of 60 percent to 80 percent, assuming the composted residue can be marketed.

The SmartFerm anaerobic digestion system chosen for City Terrace Recycle's MRF and Transfer Station will involve the following basic functions:

- Source-separated foodwaste and segregated greenwaste will be received in the proposed new tipping building.
- Within a matter of hours, the material will be mixed with a loader, screened to remove reject material (glass, dirt, and other inert material that will not digest).
- The feedstock will then be loaded into the digesters, which are enclosed concrete "garage" type structures where bacteria ingest the organic matter and produce biogas (a blend of methane and CO_2).
- The biogas is collected and converted to CNG fuel via a physical/chemical processes.
- The solid residue remaining from the digestion process will be transferred to a composting facility.
- The CNG will be stored for fueling trucks overnight.

See photographs and layout drawings at the end of this section.

CNG Conversion Overview

To create CNG fuel from the biogas (BioCNG fuel), biogas is piped into a conditioning unit where moisture (H2O), hydrogen sulfide (H2S), volatile organic compounds (VOCs), and carbon dioxide (CO2) are removed. After cleaning and conditioning, BioCNG fuel meets Society of Automotive Engineers (SAE) standard minimum methane content of 95% (SAE J1616) and engine manufacturer's fuel specifications.

The fuel is then routed to a CNG fueling station, where it is compressed for use in CNG vehicles. It can be used directly or mixed with natural gas to produce a blended vehicle fuel similar to biodiesel or ethanol/gasoline blends.

See photographs and layout drawings at the end of this section.

Environmental Issues

Overall air emissions from the AD process at City Terrace Recycling MRF and Transfer Station are expected to be very low because the biogas is not combusted to make electricity (which does have criteria pollutant emissions such as NO_x and CO), but instead is converted to CNG fuel in a fully enclosed process.

The only potentially significant impact from the facility is odor. To mitigate possible odor issues, City Terrace Recycling proposes the following control measures:

Waste Receiving

- All incoming food and greenwaste will be received inside a building.
- Within minutes, the material is pushed into a fully-enclosed receiving chamber, with a door that seals it.

Digestate Handling

- When digestion is complete, the digestion chamber is aerated, and exhaust air treated by a biofilter before release.
- The aerated digestate is then loaded into a transfer truck inside the building.
- The truck is tarped and the load hauled to a composting site.

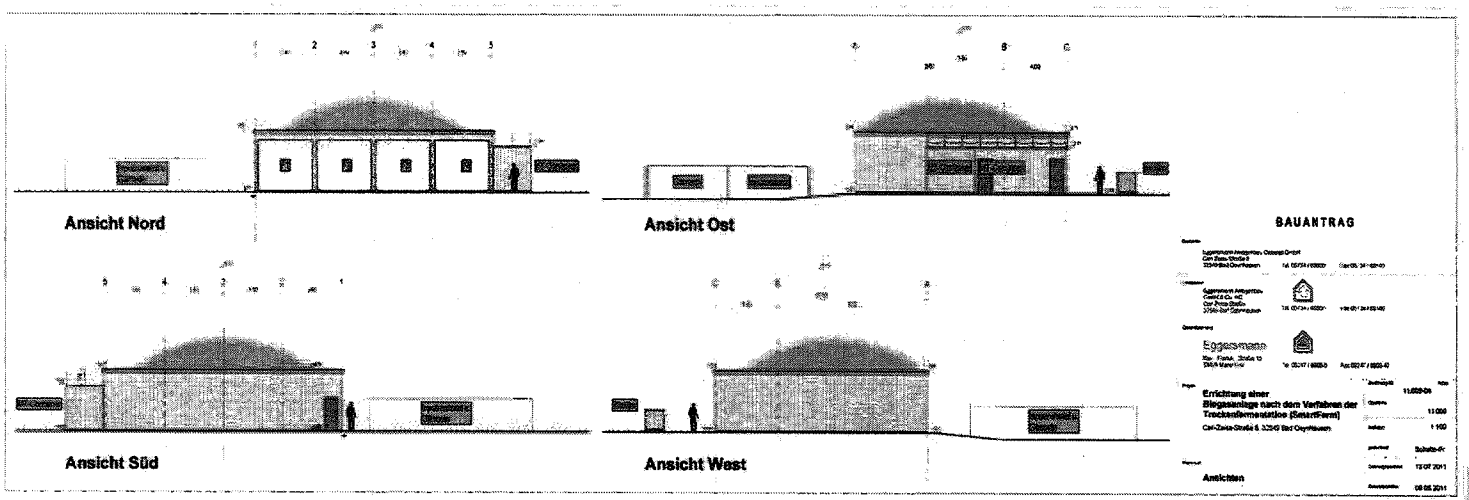
This digestate loading operation occurs only once every few days.

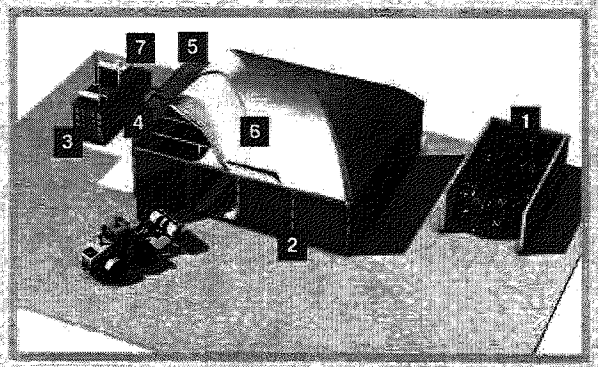
SmartFerm Anaerobic Digestion

Photographs and Layout

SMARTFERM

SEMI-MOBILE DRY FERMENTATION





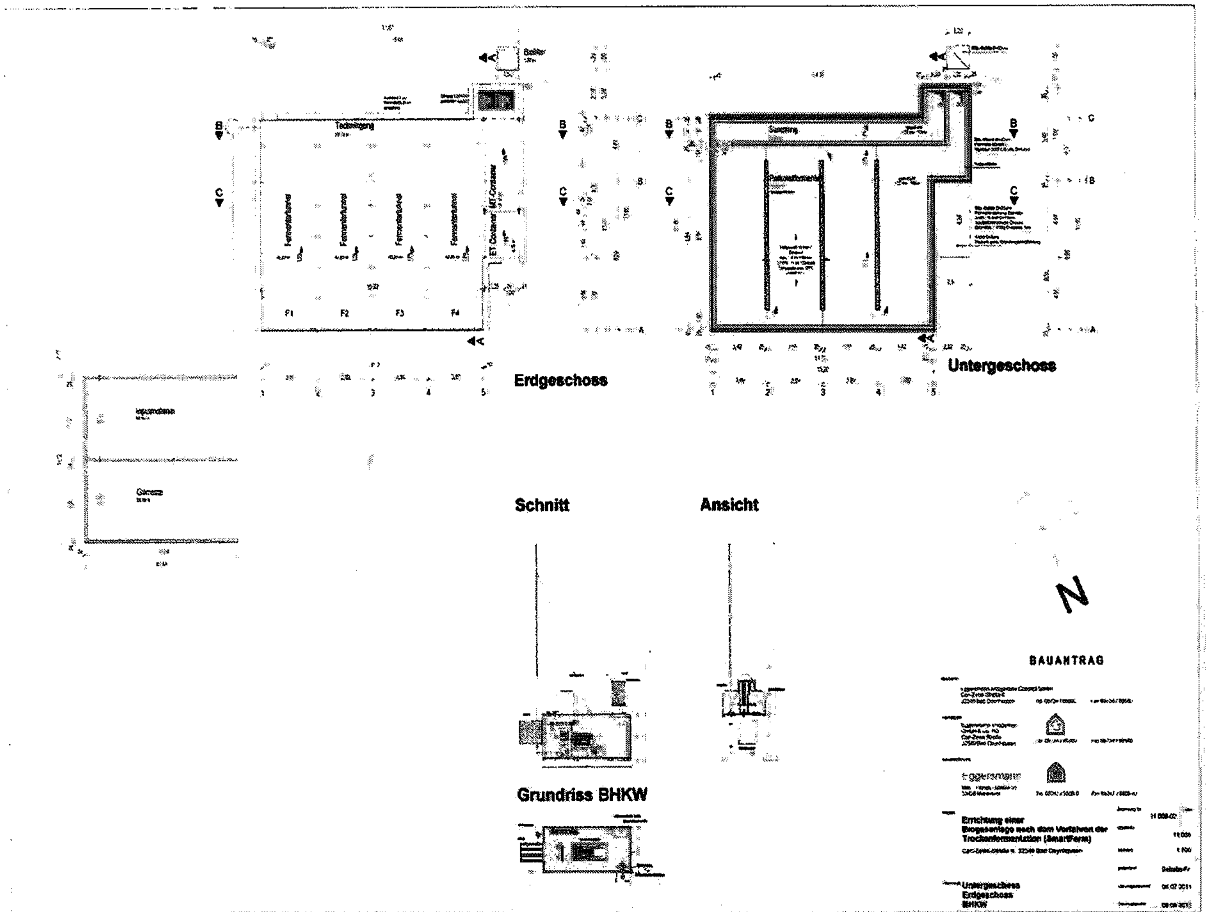
1. Substratlager / *Input storage*
2. 4 Trockenfermenter / *4 dry fermenters*
3. BHKW / *CHP*
4. Maschinentechnik / *Machine technology*
5. Elektrotechnik / *Electrical technology*
6. Gasspeicher / *Gas storage*
7. Biofilter / *Biofilter*

SMARTFERM ist die kompakte Lösung mit wenig Platzbedarf, die sich in kurzer Bauzeit realisieren lässt

SMARTFERM is the compact solution with minimal space requirement, installed in only a short time

SMARTFERM

SEMI-MOBILE DRY FERMENTATION

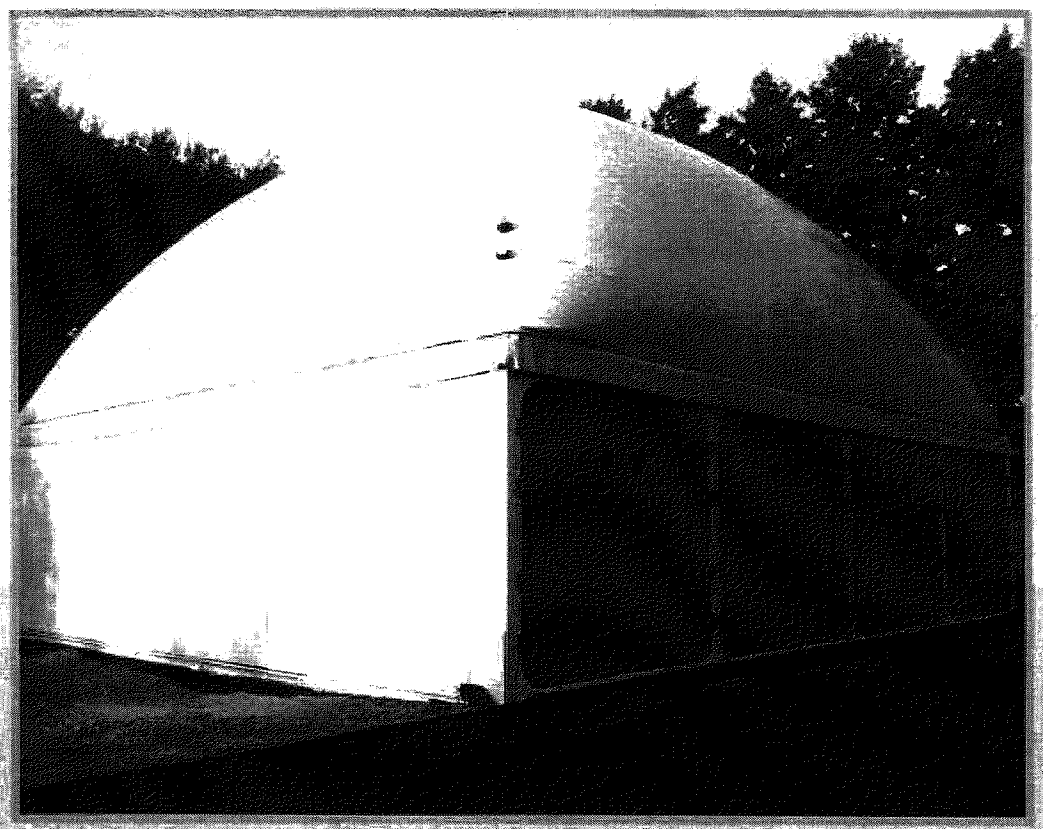


A SMARTFERM plant is comprised of 4 on-site, pre-assembled dry fermenters in container design, the equipment containers, a biofilter, and the combined heat and power plant.

SMARTFERM entspricht in der Ausstattung und Technik großen Abfallbehandlungsanlagen

SMARTFERM

SEMI-MOBILE DRY FERMENTATION



The plant, with gas storage, is installed.

BAUVERLAUF

Installation process

CNG Conversion

Photographs and Layout

BioCNG

Biogas to Compressed Natural Gas

Vehicle fuel for a green future

Cornerstone Environmental Group, LLC has developed a patent pending biogas conditioning system that economically produces biogas-based fuel "**BioCNG**" to power compressed natural gas (CNG) vehicles
The **BioCNG** system is

- Designed to use biogas from a variety of sources, including landfills, wastewater treatment digesters and agricultural and food waste digesters
- Flexible enough to be used for small or large vehicle fleets
- May be added to existing biogas energy production systems or serve as a standalone energy recovery system
- In operation at the Rodefeld Landfill, in Dane County, Wisconsin
- Designed to produce fuel that meets SAE J1616 and engine manufacturers' specifications

How does the BioCNG system work?

- Biogas is piped into the BioCNG conditioning unit where moisture (H_2O), hydrogen sulfide (H_2S),volatile organic compounds (VOCs) including siloxanes and carbon dioxide (CO_2) are removed
- After conditioning, the fuel is routed to a CNG fueling station where it is compressed for use in CNG vehicles
- The conditioned biogas can be used directly in CNG vehicles or mixed with natural gas

How much fuel is produced?

System Size	Biogas Inlet Flow (scfm)	Fuel Production (GGE/day)
BioCNG 50	50	200 - 275
BioCNG 100	100	375 - 550
BioCNG 200	200	775 - 1100

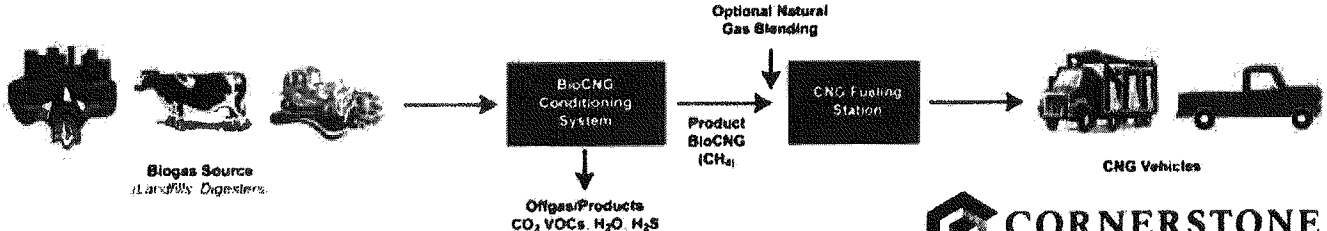
How will BioCNG be sold and delivered to customers?

Cornerstone offers several ways of delivering the BioCNG system, depending upon a customer's particular needs and preferences. Available options range from equipment sales to turnkey projects including financing options

What are the project economics?

- BioCNG system fuel production costs are estimated to be approximately 25% of the price of conventional gasoline
- Alternative fuel production tax credits/rebates up to $0.50/GGE may be available
- A basic BioCNG 50 conditioning system is estimated to cost approximately $400,000 plus installation and fueling equipment.
- Actual prices will depend upon site conditions, the number of vehicles that require fueling, and if blending with natural gas is required

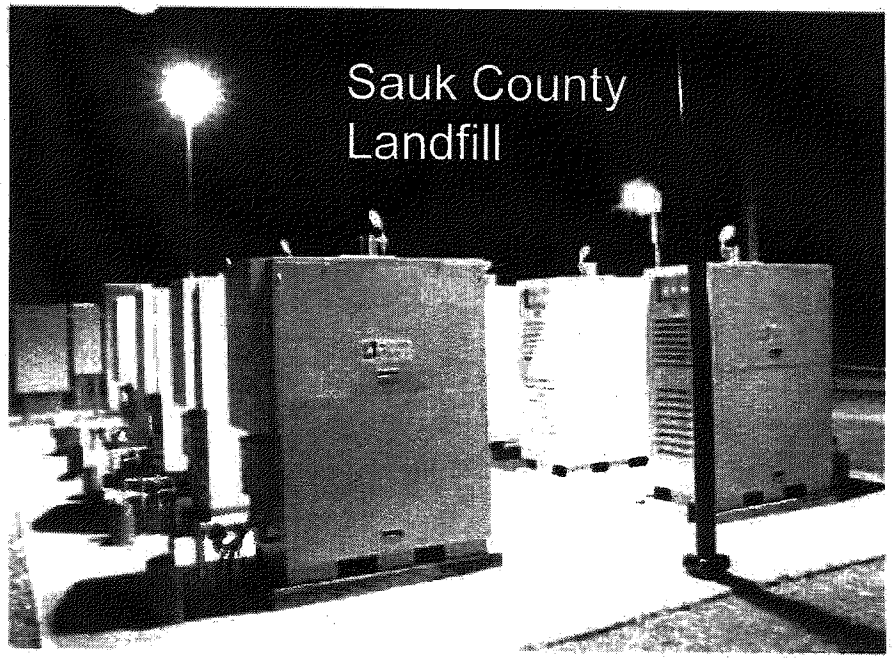
Interested parties are invited to contact us to view the system in operation and/or return the questionnaire on the back of this sheet.

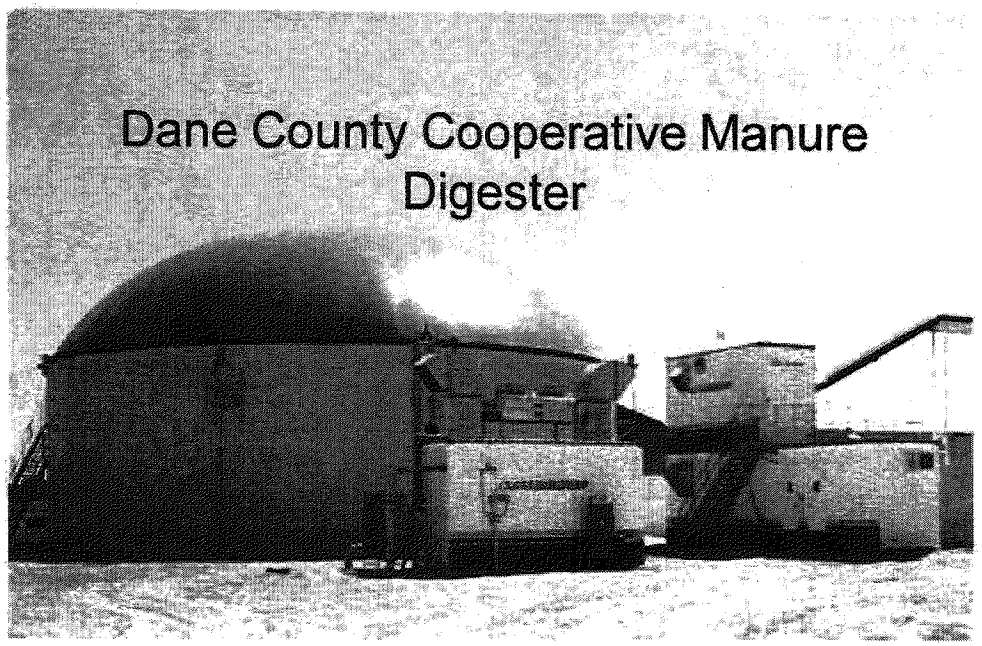


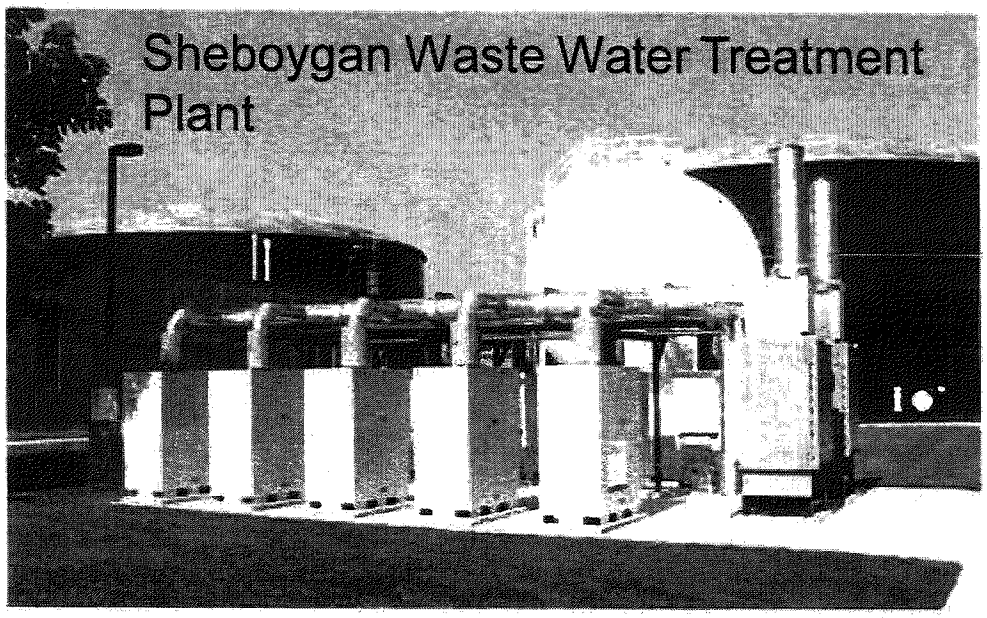
BioCNG Vehicle Fueling System

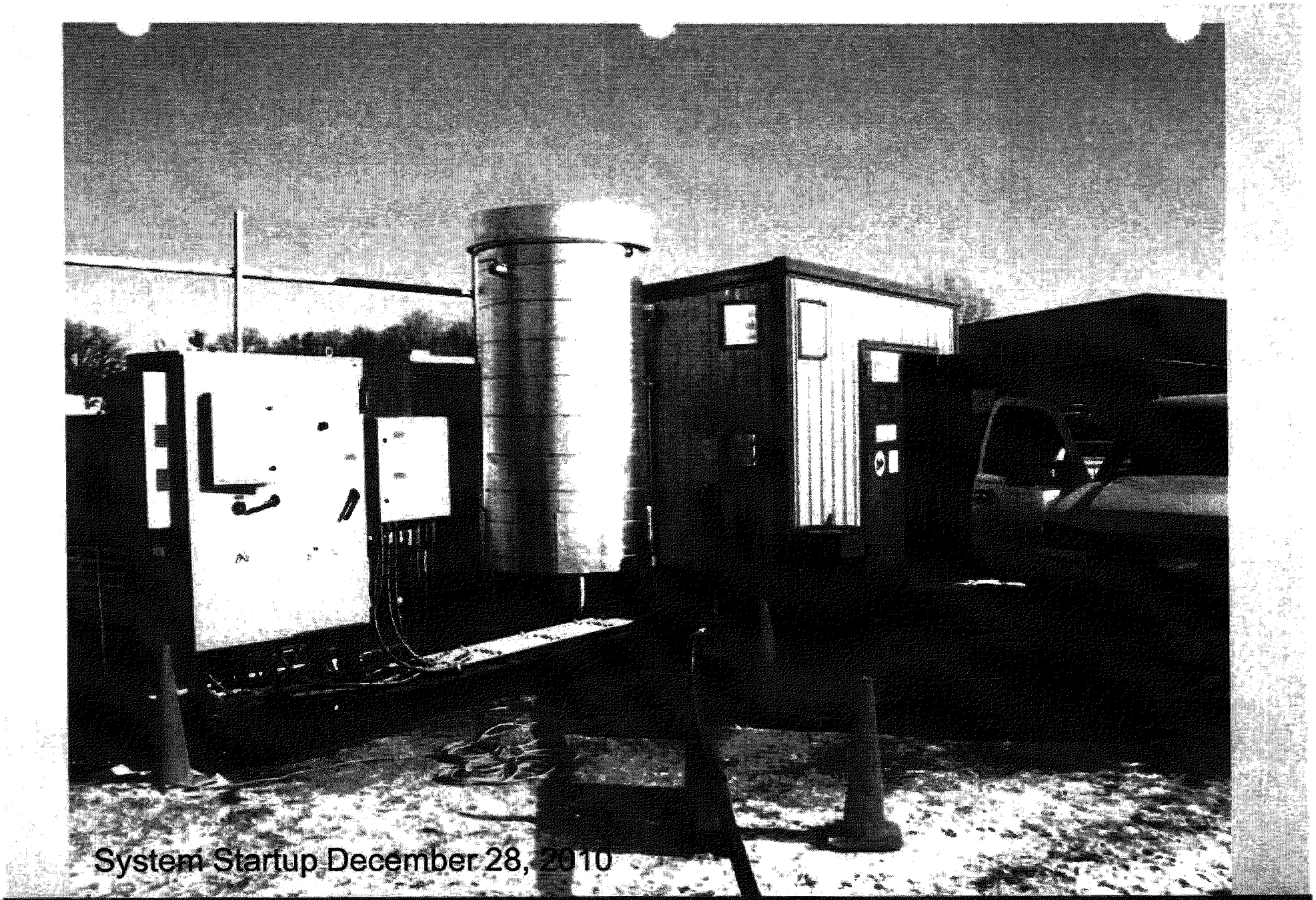
CORNERSTONE
Environmental Group, LLC

October 2011

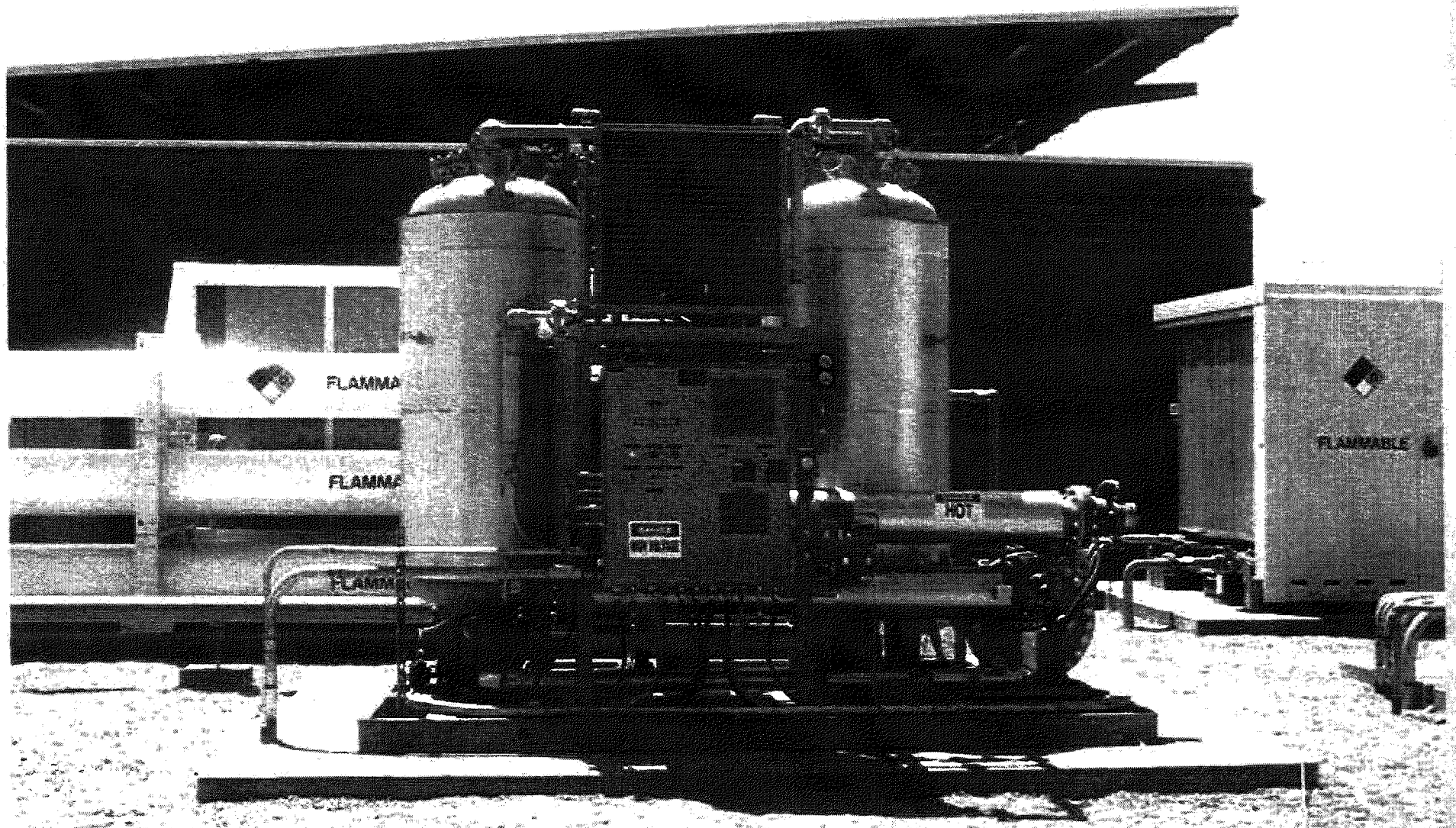

Sauk County
Landfill


Dane County Cooperative Manure
Digester


Sheboygan Waste Water Treatment
Plant



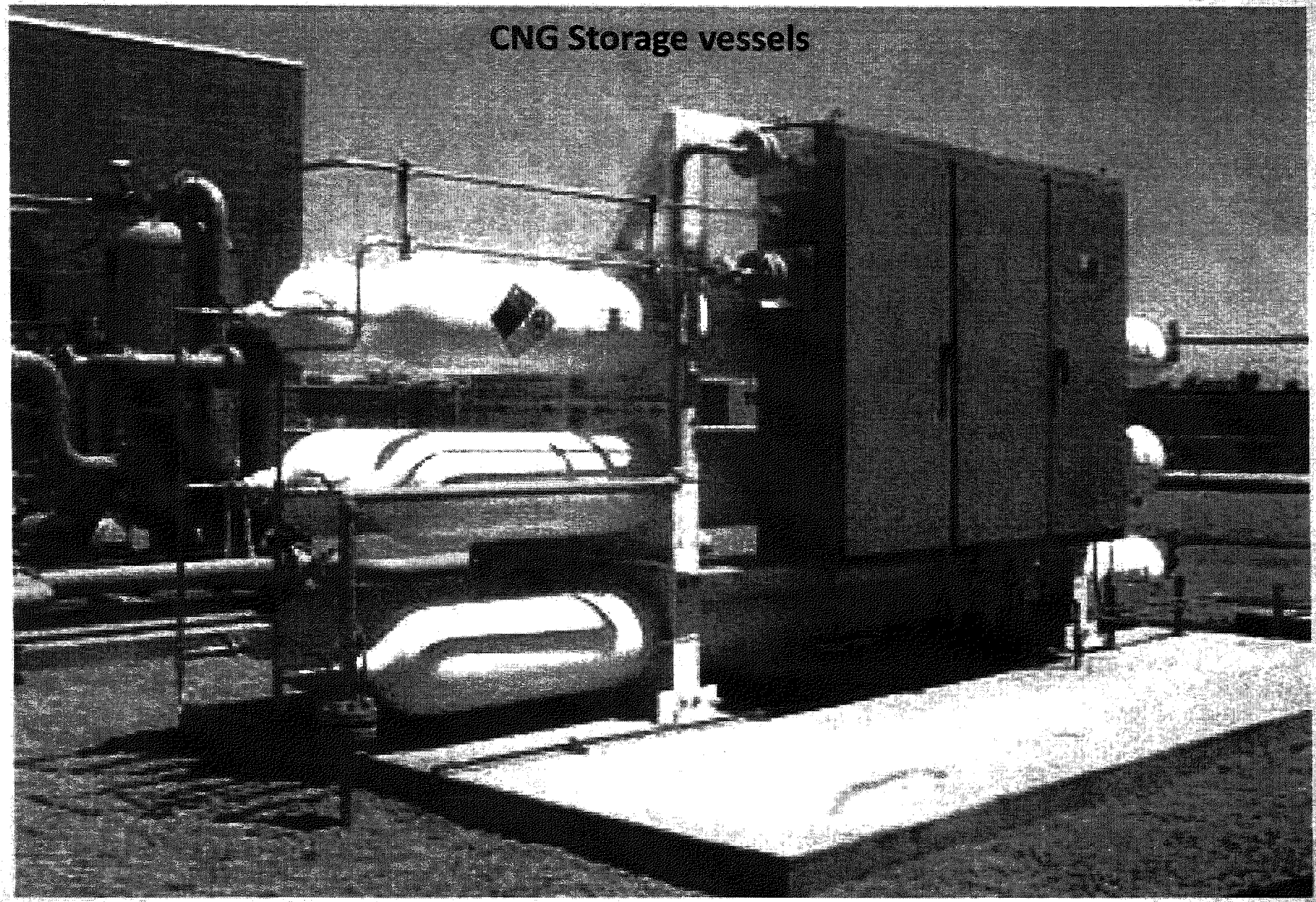
FORESTER UNIVERSITY



CNG Moisture Removal System

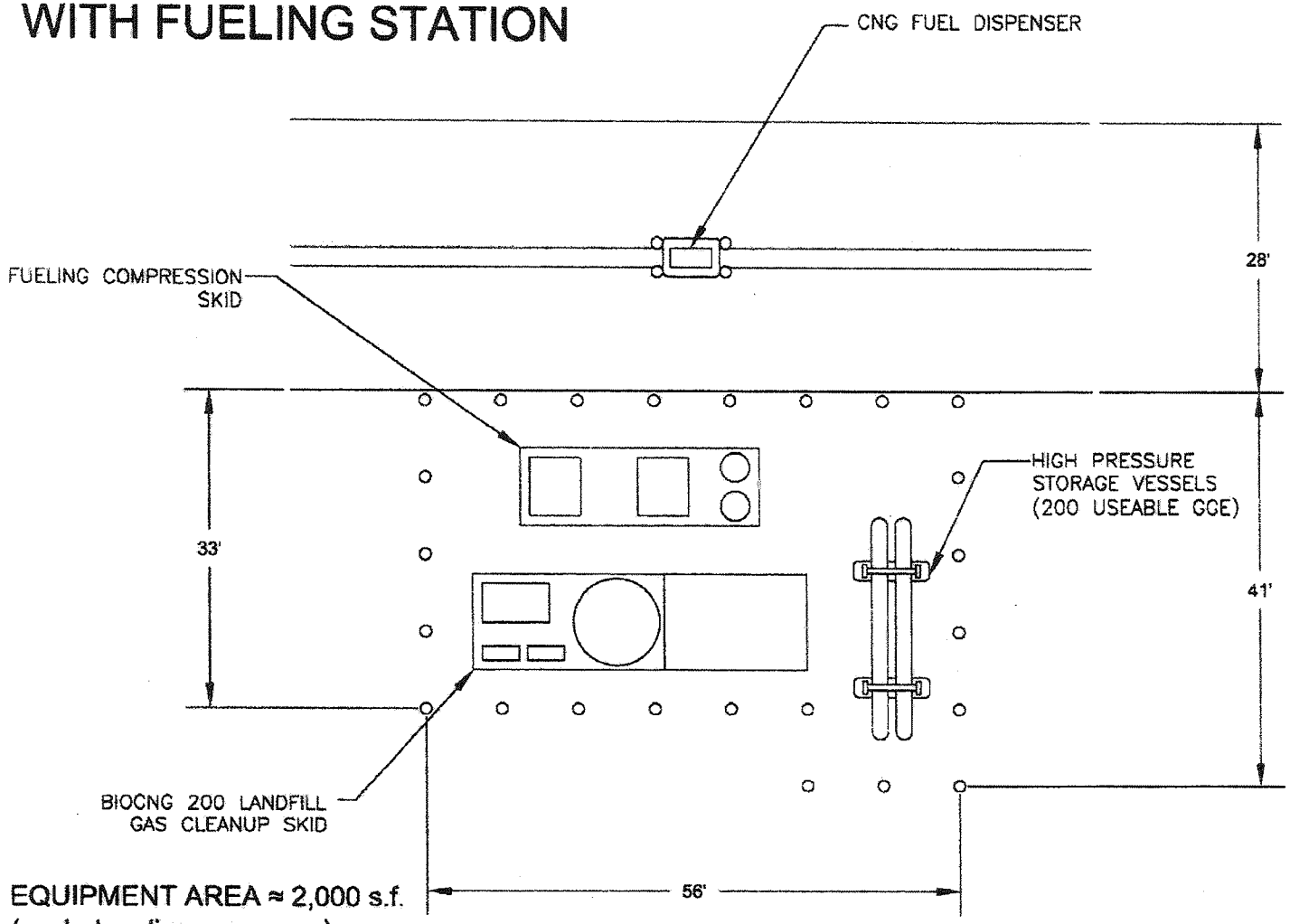
FORESTER UNIVERSITY

CNG Storage vessels



Greening the Fleet with Biogas Mark Torresani, P.E., Cornerstone Environmental Group, LLC.

TYPICAL BIOCNG SYSTEM WITH FUELING STATION



EQUIPMENT AREA ≈ 2,000 s.f.
(excludes dispenser area)

CORNERSTONE
Environmental Group, LLC